

EPA Reg. No. 84565-3

ISB'S Front-end PRIA Completeness Screen
Draft 3; 10/25/07

EPA Receipt Date: JUN 17 2008		EPA Reg. Number: 84565-6		
	Check List Item	Yes	No	N/A
1	Has the PRIA Fee been Paid; is a copy of the check or Pay.gov receipt included in the Submission Package?	X		
2	Is an Application Form (EPA Form 8570-1) Included in the Submission Package, is it completely filled out and signed including package type?	X		
3	Is a Confidential Statement of Formula (EPA Form 8570-29) Included in the Submission Package, is it completely filled out and signed (boxes 1-21)?	X		
4	Is a Formulator's Exemption Statement (EPA Form 8570-27) Included in the Submission Package?		X	
5	Is a Certification with Respect to Citation of Data (EPA Form 8570-34) Included in the Submission Package?	X		
6	Is a Data Matrix (EPA Form 8570-35) Included in the Submission Package?	X		
7	Is a Label Included in the Submission Package?	X		
8	Are Data Included in the Submission Package?	X		
9	Is the Submission an Amendment?		X	

Material to be added to an e-Jacket/Jacket

Reg. No. 84565-3

1. ☒ Placement within the e-Jacket/jacket:

- ☐ Default: (chronological; top/newest)
- ☐ Description: (PDF page number, i.e., "before page 45")
-
-

2. ☒ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☐ Notification
- ☐ New CSF
- ☒ Other: Final Printed Label

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's name: Sylvester George

Phone: 603-0688 Division: BPPD

Date: 5/9/2012

Receipt for Section 3

S: 315299

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Miscellaneous Receipt

Billable: ☒ Yes ☐ No

Company: 84565 BULL RUN SCIENTIFIC, VBT ☒

Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91

Product #: 84565-3 Product Name: WASP HORNET YELLOWJACKET ATTRACTA

Override#:

Me Too

Me Too

Section3:

Product Name:

Application Date: 13-Apr-2012

OPP Rec'd Date: 13-Apr-2012

Front End Date: 13-Apr-2012

Risk Manager Send Date: 17-Apr-2012

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Past Track: ☐

New Ingredient: ☐

Receipt Description:

FPL

New Ingredient:

Request Date:

New Ingredient:

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Paper Label

View/Edit

April 13, 2012
HAND DELIVERED

Document Processing Desk
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202
Attn: Linda Hollis

Dear Ms. Hollis:

RE: Wasp Hornet Yellowjacket Attractant System
EPA Registration No. 84565-3
January 30, 2012 Stamped Approved Label
Submission of Finished Printed Labels

This letter and the enclosures are submitted on behalf of Bull Run Scientific, VBT.

On January 30, 2012, EPA stamped "Approved" a revised label for the Wasp Hornet Yellowjacket Attractant System (EPA Registration No. 84565-3) that includes "First Aid and" in the referral statement on the front panel. Enclosed are two copies of the associated finished printed label. To facilitate filing, I have added "submitted April 13, 2012" to the back side of the labels.

Sincerely,



Cynthia Ann Smith
Agent for Bull Run Scientific, VBT

cc: G. Simpson



United States
Environmental Protection Agency
Washington DC 20460

Registration
Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 84565-3	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Wasp Hornet Yellowjacket Attractant System	PM# 91	
5. Name and Address of Applicant (Include ZIP Code) Bull Run Scientific, VBT 3900 Westerre Parkway, Suite 300 Richmond, VA 23233 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated January 30, 2012
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Labels:

1. Tube, 0.05 oz.
2. Kit, 0.05 oz.
3. Trap

Complies with
EPA Accepted Labeling

Date: JAN 30, 2012Reviewer: Sylvester George**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted			If "Yes" Unit Packaging wgt.	No. per container	
			If "Yes" Package wgt.	No. per container	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for Identification of individual to be contacted, if necessary, to process this application.)		
Name Cynthia Ann Smith	Title Agent for Bull Run Scientific, VBT	Telephone No. (Include Area Code) 703-339-1117
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Cynthia Ann Smith</i>	3. Title Agent for Bull Run Scientific, VBT	
4. Typed Name Cynthia Ann Smith	5. Date 4/13/2012	

Reviewer: Sylvester George

Bull RunScientific, VBT

Hecho en EE.UU.
WWW. [bullrunscientific.com](http://www.bullrunscientific.com)

Vea las instrucciones completas en el interior

Modo de acción no tóxico
contra las plagas objetivo

No se deja al alcance de los niños.
EPA Reg. No. 24565-3

No daña al medio ambiente - No requiere cebo adicional

funciona en la Trampa W.H.V. de RESCUE! para
atrapar a 3 tipos de insectos picadores plagal:
Avispas papeleras, Polistes
Los avispones "cara blanca" y los avispones europeos
Avispas "chaqueta amarilla"

PARA AVISPAS Y AVISPONES
ATTRAENTE

WASP • HORNET • YELLOWJACKET

Bull Run Scientific, VBT

AAA

Modelo _____
Suministro para 2 semanas

Model _____ 2-week supply

AAA
WASP • HORNET • YELLOWJACKET

Non-toxic
mode of action
against target pests

Made in USA
WWW. [bullrunscientific.com](http://www.bullrunscientific.com)

ATTRACTANT KIT

Works in the Bull Run AAA Trap to capture 3
types of stinging pest insects!

- Paper Wasps
- Bald-faced Hornets and European Hornets
- Yellowjackets

Environmentally responsible • No extra food bait required

Complete
instructions
inside

Bull Run Scientific, VBT

Bull Run Scientific, VBT
Bull Run Scientific, VBT
1900 Westside Parkway, Suite 200
Richmond, VA 23133 USA
www. [bullrunscientific.com](http://www.bullrunscientific.com) Toll-free: 1-800-
1-800-
EPA Reg. No. 24565-3

Contents / Ingredients	
1 Tube Net Wt. 0.65 oz	Active Ingredients: Hexyl Butyrate ... 99.8% Other Ingredients ... 0.2% Total ... 100.0%

Contents / Ingredients	
1 Vial Net Wt. 0.55 oz	Active Ingredients: 7-Methyl-6-bromal ... 99.75% Other Ingredients ... 0.25% Total ... 100.0%

Contents / Ingredients	
1 Bottle Net Wt. 0.78 oz	Active Ingredients: Acetic Acid ... 8.0% Other Ingredients ... 92.0% Total ... 100.0%

Keep Out of Reach of Children. **CAUTION** See instructions inside for first aid and additional precautionary statements.

AAA

WASP • HORNET • YELLOWJACKET TRAP



Non-toxic mode of action against target pests

Modo de acción no tóxico contra las plagas objetivo

Why guess which pest is bugging you? Now one trap does the trick. The Bull Run AAA Trap is the only trap proven to catch wasps, hornets and yellowjackets.

The combination of three attractants and the distinctive design of the AAA Trap have been developed by the Bull Run team of scientists and extensively tested over numerous years.

- No killing agents – insects either drown or dehydrate
- Attractant included - lasts two weeks
- No extra food bait required
- Catches queens in spring before they build nests
- Catches workers from summer through fall
- Double-chambered design keeps insects trapped
- Durable construction holds up for multiple seasons

Complete instructions inside.

WWW.

.COM

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the Bull Run AAA Trap.

¿Para qué adivinar qué plaga lo está molestando? Ahora, una sola trampa se encarga de todo. La Trampa AAA de Bull Run es la única que atrapa avispas, avispones e incluso las avispas conocidas como "chaqueta amarilla".

La combinación de tres atrayentes y el distintivo diseño de la Trampa AAA han sido desarrollados por nuestro equipo de científicos y evaluados exhaustivamente durante varios años.

Bull Run Scientific, VBT

Modelo/Modelo WHYTR

The Bull Run AAA Trap is proven to catch the following species, identified below by their coloration and markings.

La Trampa AAA de Bull Run atrapa a las siguientes especies, identificadas a continuación según la coloración y las manchas:

Paper Wasps Avispas papeleras, Polistes



Paper Wasp
Polistes fuscatus



Golden Paper Wasp
Polistes aurifer

European Paper Wasp
Polistes dominulus



Red Wasp
Polistes carolina



Paper Wasp
Polistes metricus

Hornets Avispones



Bald-faced Hornet
Dolichovespula maculata



European Hornet
Vespa crabro

Yellowjackets

Avispas comunes o "chaqueta amarilla"



Aerial Yellowjacket
Dolichovespula arenaria



Blackjacket
Vespa consobrina

Submitted 4/13/2012

• REUSABLE •
ATTRACTANT INCLUDED



AAA TRAP

for **WASPS, HORNETS
& YELLOWJACKETS**
LA TRAMPA PARA AVISPAS Y AVISPONES

Contents	Ingredients
1 Tube Net Wt. 0.65 oz	Active ingredient: Heptyl Butyrate... 99.8% Other ingredients... 0.2% Total... 100.0%

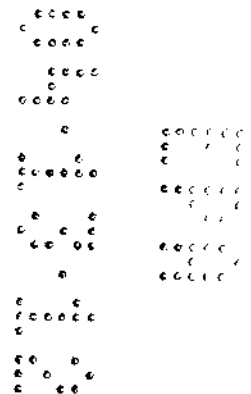
Contents	Ingredients
1 Vial Net Wt. 0.95 oz	Active ingredient: 2-Methyl-1-butanol... 59.75% Other ingredients... 40.25% Total... 100.0%


Contents	Ingredients
1 Bottle Net Wt. 0.88 oz	Active ingredient: Acetic Acid... 8.0% Other ingredients... 92.0% Total... 100.0%

Keep Out of Reach of Children • CAUTION See Instructions Inside for first aid and additional precautionary statements

No se deje al alcance de los niños • Vea el interior para primeros auxilios e información preventiva
Another environmentally responsible product from

Bull Run Scientific, VBT





Modo de acción no tóxico
contra las plagas objetivo

Vea las instrucciones completas en el interior

Hecho en EE.UU. www.bullrunscientific.com

ATTRAENTE
WASP • HORNET • YELLOWJACKET

AAA

Suministro para 2 semanas

Modelo _____

AAA
WASP • HORNET • YELLOWJACKET

ATTRACTANT KIT
Works in the Bull Run AAA Trap to capture 3 types of stinging pest insects!

- Paper Wasps
- Bald-faced Hornets and European Hornets
- Yellowjackets

Environmentally responsible • No extra food bait required

Complete instructions inside

Non-toxic mode of action against target pests

Made in USA www.bullrunscientific.com

Bull Run Scientific, VBT
3900 Westerbe Parkway, Suite 300
Richmond, VA 23233 USA
1-800-845-6553
EPA Est. No. B4565-3

Contents	Ingredients
1 Tube Net Wt. 0.05 oz	Active Ingredient: Propyl Butyrate... 99.8% Other ingredients... 0.2% Total... 100.0%

Contents	Ingredients
1 Wal Net Wt. 0.25 oz	Active Ingredient: 2-Methyl-1-butanol... 59.75% Other ingredients... 40.25% Total... 100.0%

Contents	Ingredients
1 Bottle Net Wt. 0.88 oz	Active Ingredient: Acetic Acid... 8.0% Other ingredients... 92.0% Total... 100.0%

Keep Out of Reach of Children. **CAUTION** See Instructions inside for first aid and additional precautionary statements.

AAA

WASP • HORNET • YELLOWJACKET **TRAP**

Bull Run Scientific, VBT

Model/Modelo WHYTR



**Non-toxic mode of action
against target pests**

Modo de acción no tóxico contra las plagas objetivo

**Why guess which pest is bugging you? Now one trap does the trick.
The Bull Run AAA Trap is the only trap proven to catch wasps, hornets
and yellowjackets.**

**The combination of three attractants and the distinctive design of the
AAA Trap have been developed by the Bull Run team of scientists and
extensively tested over numerous years.**

- No killing agents – insects either drown or dehydrate
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- Catches workers from summer through fall
- Double-chambered design keeps insects trapped
- Durable construction holds up for multiple seasons

Complete instructions inside.

WWW.

.COM

Visit our web site for more information on the
different species of wasps, hornets and
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**¿Para qué adivinar qué plaga lo está molestando? Ahora, una sola trampa se encarga de
todo. La Trampa AAA de Bull Run es la única que atrapa avispas, avispones e incluso las
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**La combinación de tres atrayentes y el distintivo diseño de la Trampa AAA han sido
desarrollados por nuestro equipo de científicos y evaluados exhaustivamente durante
varios años.**

**The Bull Run AAA Trap is proven to catch the following species,
identified below by their coloration and markings:**

La Trampa AAA de Bull Run atrapa a las siguientes especies, identificadas a
continuación según la coloración y los manchas:

Paper Wasps
Avispas papeleras, Polistes



Paper Wasp
Polistes fuscatus



Golden Paper Wasp
Polistes aurifer

European Paper Wasp
Polistes dominulus



Red Wasp
Polistes carolina



Paper Wasp
Polistes metricus

Hornets
Avispones



Bald-faced Hornet
Dolichovespula maculata



European Hornet
Vespa crabro

Yellowjackets
Avispas comunes o "chaqueta amarilla"



Aerial Yellowjacket
Dolichovespula areolaris



Blackjacket
Vespa consobrina

Subm. H. 2 4/13/2012

Bull Run Scientific, VBT

c/o Cynthia Ann Smith

Conn & Smith, Inc.

6713 Catskill Road

Lorton, VA 22079-1113

JAN 30 2012

Subject: Label Amendment to add "First Aid and" to the referral statement on the front panel.
 Wasp Hornet Yellowjacket Attractant System
 EPA Reg. No.: 84565-3
 Your submission dated October 11, 2011
 Decision Number: 456509

Dear Ms. Smith:

The amendment referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c)(5), is acceptable provided that you:

- 1) Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
- 2) Submit two (2) copies of your final printed labeling before you release the product for shipment. Final printed labeling means the label or labeling of the product when distributed or sold. Clearly legible reproductions or photo reductions will be accepted for unusual labels, such as those silk-screened directly onto glass or metal containers or large bags or drum labels.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Should you have any questions, you may contact Mr. Colin Walsh directly at (703) 308-0298 or via email at walsh.colin@epa.gov.

Sincerely,



Linda A. Hollis, Chief

Biochemical Pesticides Branch

Biopesticides and Pollution

Prevention Division (7511P)

CONCURRENCES

SYMBOL	7511P	7511P					
SURNAME	Walsh	COLE					
DATE	1/16/12	1/13/12					

WASP HORNET YELLOWJACKET ATTRACTANT SYSTEM (EPA REG. NO. 84565-3)
AND ALTERNATE BRAND NAMES:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, AND
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

October 11, 2011 Proposed Amended Master Label

Based upon the February 3, 2010 Stamped Accepted Master Label

To Add "First Aid and" to the Referral Statement to the Front Panel

(Changes Are Implemented)

ACCEPTED

Page 1 of 12

JAN 30 2012

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for
the pesticide registered under
EPA Reg. No. 84565-3

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Notes:

- The WASP HORNET YELLOWJACKET TRAP SYSTEM contains three attractants, each with one active ingredient:
 - Heptyl butyrate (99.8%);
 - 2-Methyl-1-butanol (59.75%); and
 - Acetic acid (8.0%).
- The AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS includes the trap and the three attractants.
- The AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT is the attractant refill for the AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS and contains the three attractants without the trap.

AND ALTERNATE BRAND NAMES:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, AND

2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

October 11, 2011 Proposed Amended Master Label

Based upon the February 3, 2010 Stamped Accepted Master Label

To Add "First Aid and" to the Referral Statement to the Front Panel (Changes Are Implemented)

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS**1.1. Instructions****AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS
INSTRUCTIONS****AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS**

The AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS and the AAA ATTRACTANT KIT are proven to lure and trap the following species: Paper Wasp (*Polistes fuscatus*), European Paper Wasp (*P. dominulus*), Golden Paper Wasp (*P. aurifer*), Paper Wasp (*P. metricus*), Red Wasp (*P. carolina*), European Hornet (*Vespa crabro*), Bald-faced Hornet (*Dolichovespula maculata*), Aerial Yellowjacket (*D. arenaria*), Blackjacket (*Vespula consobrina*), California Yellowjacket (*V. sulphurea*), Common Yellowjacket (*V. vulgaris*), Eastern Yellowjacket (*V. maculifrons*), Forest Yellowjacket (*V. acadica*), German Yellowjacket (*V. germanica*), Northeastern Yellowjacket (*V. vidua*), Prairie Yellowjacket (*V. atropilosa*), Southern Yellowjacket (*V. squamosa*), Transition Yellowjacket (*V. flavopilosa*), Western Yellowjacket (*V. pensylvanica*).

CONTENTS	INGREDIENTS
1 TUBE	Active ingredient: Heptyl Butyrate 99.8%
NET WT:	Other ingredients 0.2%
0.05 oz	Total 100.0%
1 VIAL	Active ingredient: 2-Methyl-1-butanol 59.75%
NET WT:	Other ingredients 40.25%
0.05 oz	Total 100.00%
1 BOTTLE	Active ingredient: Acetic Acid 8.0%
NET WT:	Other ingredients 92.0%
0.88 oz	Total 100.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION****PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

Caution. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse. This product contains wasp, hornet and yellowjacket attractant. Wasp, hornet and yellowjacket stings can cause allergic reactions and death. Seek immediate medical attention if stung and an allergic reaction occurs.

AND ALTERNATE BRAND NAMES:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, AND
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

October 11, 2011 Proposed Amended Master Label

Based upon the February 3, 2010 Stamped Accepted Master Label

To Add "First Aid and" to the Referral Statement to the Front Panel (Changes Are Implemented)

FIRST AID	
If in Eyes:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 AM to 4:30 PM Pacific Time.</p>	

DIRECTIONS FOR USE

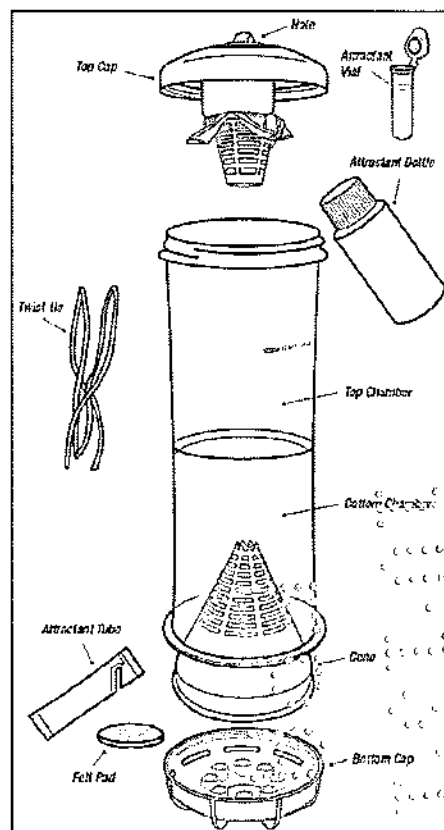
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For residential, commercial, and agricultural use. For non-food use only.

Do not hang trap if you are allergic to wasp, hornet or yellowjacket stings.

INITIAL SETUP

1. Remove twist-tie and enclosed Attractant Vial and Attractant Bottle from top chamber.
2. Remove Attractant Tube and felt pad from bottom chamber. (Leave cone in place.)
3. Bait the bottom chamber first:
 - a. Place felt pad into center of bottom cap.
 - b. Cut tip of Attractant Tube.
 - c. Carefully empty attractant liquid onto felt pad.
 - d. Screw bottom cap back in place.
 - e. Set trap on flat surface.
4. Next, bait the top chamber:
 - a. Remove Attractant Vial from its plastic pouch.
 - b. Pop open lid to Attractant Vial and snap into one of three notches next to the cone in the trap top cap. (Figure 1)
 - c. Pour attractant bottle contents into top chamber.
 - d. Add water to top chamber so solution reaches the Start Line. Add 1-2 drops dishwashing liquid to the water mixture*.
 - e. Thread twist-tie through hole on top cap.
 - f. Screw top cap back on and hang trap outdoors. (Figure 2)
5. Wash hands with soap and water.



AND ALTERNATE BRAND NAMES:

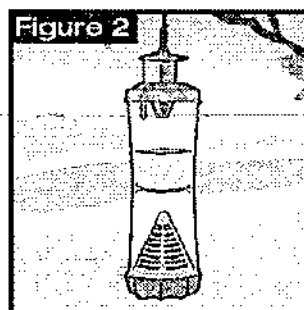
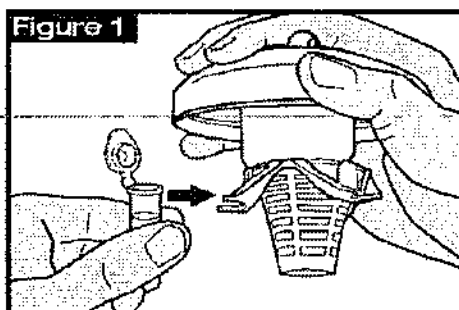
1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, AND

2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

October 11, 2011 Proposed Amended Master Label

Based upon the February 3, 2010 Stamped Accepted Master Label

To Add "First Aid and" to the Referral Statement to the Front Panel (Changes Are Implemented)

**Trap Placement:**

1. Hang trap outdoors, at least 20 feet away from plants grown for food or feed, building entries, and any known wasp, hornet or yellowjacket nests. Hang traps in late evening or early morning when wasps, hornets and yellowjackets are less active.
2. In extreme hot and dry weather, hang trap in the shade.

Top Chamber:

* Adding dishwashing liquid to the water mixture in the top chamber will coat the insects' wings and make it harder for them to fly once trapped. In hot and dry weather, liquid level in top chamber may evaporate below the Start Line before the attractant is due to be replaced. Do not add additional water to bring the liquid back up to the start line, as it will reduce attractant effectiveness.

Use Rate:

Use 2-4 traps for a 10,000 square foot area, or 8 to 16 traps per acre. For areas with heavy infestation, use a maximum of 48 traps per acre.

Reusing the Trap:

The attractants in the AAA Trap are designed to last 2 weeks. AAA Attractant Kit refills, which last an additional 2 weeks, should be available for purchase wherever the AAA trap is sold. Refills are also available through various online retailers; please visit www.aaa.com for details.

1. Check to make sure all trapped insects are dead.
2. Empty dead insects and wipe insect residue from trap. (Top chamber cannot be emptied of insects without replacing the attractant.)
3. Follow directions for baiting the bottom and top chambers in the initial setup instructions.

AND ALTERNATE BRAND NAMES:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, AND
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

October 11, 2011 Proposed Amended Master Label

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To Add "First Aid and" to the Referral Statement to the Front Panel (Changes Are Implemented)

Catching the Queens:

Wasp, hornet and yellowjacket queens hibernate during the winter, then emerge to look for nest sites. Paper wasp queens are the first to emerge, usually in late winter. Hornet and yellowjacket queens emerge later, during the first warm days of spring. When you use the AAA Trap at that time, you can capture some queens and reduce the likelihood that a nest will be established nearby. Insects caught this early in the season may not be numerous, but each queen captured represents one less nest later on. Once queens begin nest building, the AAA Trap may have periods of lower catches until worker populations grow.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry, well-ventilated location out of reach of children and pets.**DISPOSAL:** Deposit used attractant and attractant packaging in trash for collection. Wash hands with soap and water.**Bull Run**

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the Bull Run AAA Trap.

www._____.com

On Twitter? Follow us! Twitter.com/_____

Made in USA

Bull Run Scientific, VBT

3900 Westerre Parkway, Suite 300

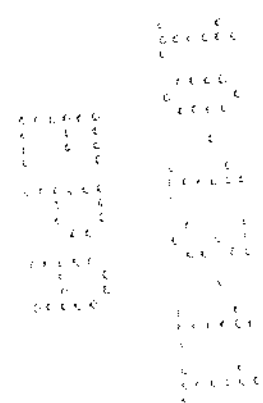
Richmond, VA 23233 USA

1-800-____-____

EPA Reg. No. 84565-3

EPA Est. No. _____

© _____, _____



AND ALTERNATE BRAND NAMES:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, AND

2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

October 11, 2011 Proposed Amended Master Label

Based upon the February 3, 2010 Stamped Accepted Master Label

To Add "First Aid and" to the Referral Statement to the Front Panel (Changes Are Implemented)

[Outer Panels of Instructions]

Bull Run

Bull Run Scientific, VBT
3900 Westerre Parkway, Suite 300
Richmond, VA 23233 USA

© _____, _____

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the Bull Run AAA Trap.

www._____.com

On Twitter? Follow us! Twitter.com/_____

Made in USA



AND ALTERNATE BRAND NAMES:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, AND

2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

October 11, 2011 Proposed Amended Master Label

Based upon the February 3, 2010 Stamped Accepted Master Label

To Add "First Aid and" to the Referral Statement to the Front Panel (Changes Are Implemented)

1.2. Trap Front Panel Label**AAA Trap for Wasps, Hornets & Yellowjackets**

Reusable

Attractant included

Another environmentally responsible product from Bull Run

CONTENTS	INGREDIENTS
1 TUBE	Active ingredient: Heptyl Butyrate 99.8%
NET WT:	Other ingredients 0.2%
0.05 oz	Total 100.0%
1 VIAL	Active ingredient: 2-Methyl-1-butanol 59.75%
NET WT:	Other ingredients 40.25%
0.05 oz	Total 100.00%
1 BOTTLE	Active ingredient: Acetic Acid 8.0%
NET WT:	Other ingredients 92.0%
0.88 oz	Total 100.0%

KEEP OUT OF REACH OF CHILDREN. CAUTION.**See Instructions Inside for First Aid and Additional Precautionary Statements.****1.3. Trap Side and Back Panel Label**

Model _____

Bull Run AAA TRAP Wasp•Hornet•Yellowjacket Trap [Product Name Logo]

Why guess which pest is bugging you? Now one trap does the trick. The Bull Run AAA Trap is the only trap proven to catch wasps, hornets and yellowjackets.

The combination of three attractants and the distinctive design of the AAA Trap have been developed by the Bull Run team of scientists and extensively tested over numerous years.

Catches 19 species of stinging pest insects in one trap

5 species of Paper Wasps

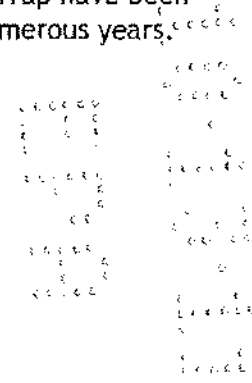
Bald-faced Hornets and European Hornets

12 species of Yellowjackets

Non-toxic mode of action against target pests

No killing agents — insects either drown or dehydrate

Reusable



AND ALTERNATE BRAND NAMES:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, AND
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

October 11, 2011 Proposed Amended Master Label

Based upon the February 3, 2010 Stamped Accepted Master Label

To Add "First Aid and" to the Referral Statement to the Front Panel (Changes Are Implemented)

Attractant included - lasts two weeks

Another environmentally responsible product from Bull Run

No extra food bait required

Catches queens in spring before they build nests

Catches workers from summer through fall

Double-chambered design keeps insects trapped

Durable construction holds up for multiple seasons

Complete Instructions Inside.

Visit www.bullrunscientific.com to learn more about our other insect traps and attractants.

On Twitter? Follow us! [Twitter.com/BullRunScientific](https://twitter.com/BullRunScientific)

Made in USA

Bull Run Scientific, VBT

3900 Westerre Parkway, Suite 300

Richmond, VA 23233 USA

1-800-____-____

EPA Reg. No. 84565-3

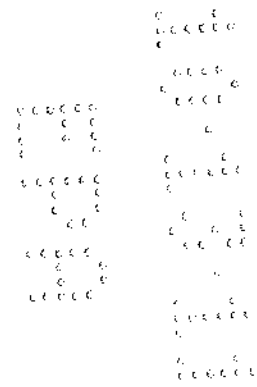
EPA Est. No. _____

© _____, _____

U.S. Patent# _____. Other domestic and international patents pending

www.bullrunscientific.com

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the AAA Trap.



AND ALTERNATE BRAND NAMES:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, AND

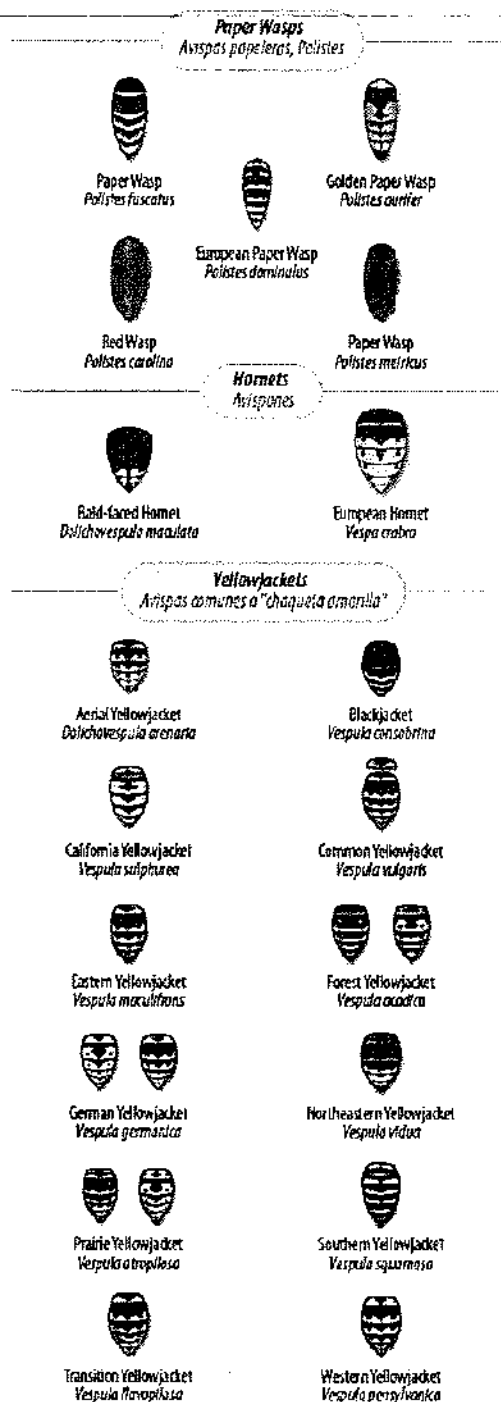
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

October 11, 2011 Proposed Amended Master Label

Based upon the February 3, 2010 Stamped Accepted Master Label

To Add "First Aid and" to the Referral Statement to the Front Panel (Changes Are Implemented)

The Bull Run AAA Trap is proven to catch the following species, identified below by their coloration and markings:



AND ALTERNATE BRAND NAMES:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, AND

2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

October 11, 2011 Proposed Amended Master Label

Based upon the February 3, 2010 Stamped Accepted Master Label

To Add "First Aid and" to the Referral Statement to the Front Panel (Changes Are Implemented)

Wondering which of these insects are in your area? Find out at www._____.com

1.4. Attractant Tube Container Label

ATTRACTANT TUBE

CAUTION: KEEP OUT OF REACH OF CHILDREN

www._____

1.5. Attractant Vial Container Label

[Product Name Logo] ATTRACTANT VIAL

CAUTION: KEEP OUT OF REACH OF CHILDREN

www._____

1.6. Attractant Bottle Container Label

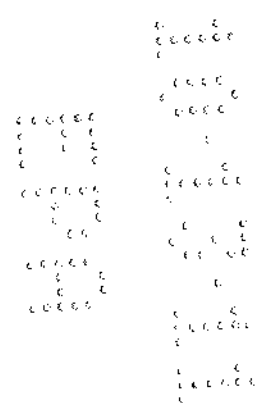
[Product Name Logo] ATTRACTANT BOTTLE

CAUTION: KEEP OUT OF REACH OF CHILDREN

Causes moderate eye irritation.

Keep away from eyes and skin. Wash hands after handling product.

www._____



AND ALTERNATE BRAND NAMES:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, AND

2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

October 11, 2011 Proposed Amended Master Label

Based upon the February 3, 2010 Stamped Accepted Master Label

To Add "First Aid and" to the Referral Statement to the Front Panel (Changes Are Implemented)

2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT**2.1. Instructions**

See Section 1.1.

2.2. Front Panel Label

Model _____

Bull Run

AAA
WASP HORNET YELLOWJACKET
ATTRACTANT KIT

2 week supply

Works in the Bull Run AAA Trap to capture 3 types of stinging pest insects!

Paper Wasps

Bald-faced Hornets and European Hornets

Yellowjackets

Environmentally responsible

No extra food bait required

Non-toxic mode of action against target pests

No killing agents — insects either drown or dehydrate

Lures queens & workers, spring to fall

CONTENTS	INGREDIENTS
1 TUBE	Active ingredient: Heptyl Butyrate 99.8%
NET WT:	Other ingredients 0.2%
0.05 oz	Total 100.0%
1 VIAL	Active ingredient: 2-Methyl-1-butanol 59.75%
NET WT:	Other ingredients 40.25%
0.05 oz	Total 100.00%
1 BOTTLE	Active ingredient: Acetic Acid 8.0%
NET WT:	Other ingredients 92.0%
0.88 oz	Total 100.0%

KEEP OUT OF REACH OF CHILDREN. CAUTION.**See Instructions Inside for First Aid and Additional Precautionary Statements.**

AND ALTERNATE BRAND NAMES:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, AND

2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

October 11, 2011 Proposed Amended Master Label

Based upon the February 3, 2010 Stamped Accepted Master Label

To Add "First Aid and" to the Referral Statement to the Front Panel (Changes Are Implemented)

www._____.com

The AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT is proven to lure the following species: Paper Wasp (*Polistes fuscatus*), European Paper Wasp (*P. dominulus*), Golden Paper Wasp (*P. aurifer*), Paper Wasp (*P. metricus*), Red Wasp (*P. carolina*), European Hornet (*Vespa crabro*), Bald-faced Hornet (*Dolichovespula maculata*), Aerial Yellowjacket (*D. arenaria*), Blackjacket (*Vespula consobrina*), California Yellowjacket (*V. sulphurea*), Common Yellowjacket (*V. vulgaris*), Eastern Yellowjacket (*V. maculifrons*), Forest Yellowjacket (*V. acadica*), German Yellowjacket (*V. germanica*), Northeastern Yellowjacket (*V. vidua*), Prairie Yellowjacket (*V. atropilosa*), Southern Yellowjacket (*V. squamosa*), Transition Yellowjacket (*V. flavopilosa*), Western Yellowjacket (*V. pensylvanica*).

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the Bull Run AAA Trap. www._____.com

On Twitter? Follow us! Twitter.com/_____

Complete instructions inside.

Made in USA

Bull Run Scientific, VBT

3900 Westerre Parkway, Suite 300

Richmond, VA 23233 USA

1-800-____-____

© _____, _____

www._____.com Twitter:@_____

EPA Reg. No. 84565-3

EPA Est. No. _____

US Patent#_____. Other domestic and international patents pending.

2.3. Attractant Vial Container Label

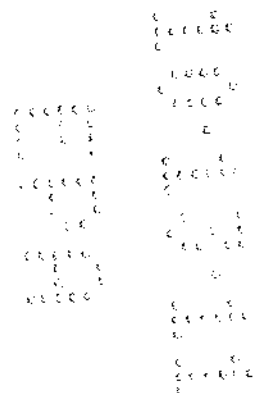
See Section 1.4.

2.4. Attractant Bottle Container Label

See Section 1.5.

2.5. Attractant Tube Container Label

See Section 1.6.



MATERIAL TO BE ADDED TO JACKET

REG #: 84565-3

Description: Label Amendment - Acceptable

if applicable, check all that are attached:		Send to CSC
<input checked="checked" type="checkbox"/>	new stamped accepted label	
<input type="checkbox"/>	new CSF	
<input type="checkbox"/>	notification	
<input type="checkbox"/>	other:	

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding the material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be placed in the appropriate bin.

Reviewer: Colin Walsh

Date: 1/30/2012

Phone: (703) 308-0298

Division: BPPD

Receipt for Section 3

S: 905203

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☐ Yes ☒ No

Company: B4565 BULL RUN SCIENTIFIC, YBT ☒


Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91


Product #: B4565 3 Product Name: WASP HORNET YELLOW JACKET ATTRACT.


Override#

Me Too
Section3:

Me Too
Product Name:

Application Date: 11-Oct-2011 

OPP Rec'd Date: 13-Oct-2011 

Front End Date: 14-Oct-2011 

Risk Manager Send Date: 17-Oct-2011 

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Label amendment

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

New Ingredient

Request Date:

New Ingredient

Received Date:

Receipt Content

Des

Paper Label

Electronic Label

View/Edit

Print Letter

Enter More Information

Tracking



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 17, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

CYNTHIA ANN SMITH
CONN & SMITH, INC.
BULL RUN SCIENTIFIC, VBT
6713 CATSKILL ROAD
LORTON, VA 22079-1113

PRODUCT NAME: WASP HORNET YELLOW JACKET ATTRACTANT SYSTEM
COMPANY NAME: BULL RUN SCIENTIFIC, VBT
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 84565-3
EPA RECEIPT DATE: 10/13/11

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Biologicals & Pollution Prevention Division, PM Team 91, at (703) 308-8733.

Sincerely,

V.E. Hoare
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{905203m~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: _____

for Division

- ☐ AD
- ☒ BPPD
- ☐ RD

Risk Mgr.

91

Receipt No.

S-

905203

EPA File Symbol/Reg. No.

84565-3

Pin-Punch Date:

10/13/2011

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

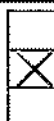
Reviewer: Andrew Bayecland

Date: 10/14/11

Remarks:



United States
Environmental Protection Agency
Washington DC 20460



Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 84565-3	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Wasp Hornet Yellowjacket Attractant System	PM# 91	
5. Name and Address of Applicant (Include ZIP Code) Bull Run Scientific, VBT c/o Conn & Smith, Inc., Agent 6713 Catskill Road, Lorton, VA 22079-1113 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of proposed minor label amendment to change the front panel referral statement
from: See Instructions Inside for Additional Precautionary Statements.
to: See Instructions Inside for First Aid and Additional Precautionary Statements.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted					
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Cynthia Ann Smith		Title Agent for Bull Run Scientific, VBT	
		Telephone No. (Include Area Code) 703-539-1117	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment, or both under applicable law.			6. Date Application Received (Stamped)
2. Signature <i>Cynthia Ann Smith</i>		3. Title Agent for Bull Run Scientific, VBT	
4. Typed Name Cynthia Ann Smith		5. Date October 11, 2011	

October 11, 2011
HAND DELIVERED

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency

One Potomac Yard
277 South Crystal Drive
Arlington, VA 22202-4501
Attn: Ms. Linda Hollis

Dear Ms. Hollis:

RE: Wasp Hornet Yellowjacket Attractant System (EPA Reg. No. 84565-3)
Proposed FAST TRACK LABEL AMENDMENT
Addition of "First Aid and" to the referral statement on the front panel

This letter and the enclosures are submitted on behalf of Bull Run Scientific, VBT.

EPA issued the stamped "Accepted" label for Wasp Hornet Yellowjacket Attractant System (EPA Reg. No. 84565-3) of February 3, 2010. Subsequently, the state of New York has required the addition of "First Aid and" to the referral statement on the front panel. Bull Run Scientific request amendment of the label to make this minor change. NO OTHER CHANGES ARE PROPOSED.

Accepted	See Instructions Inside for Additional Precautionary Statements.
Proposed	See Instructions Inside for First Aid and Additional Precautionary Statements.

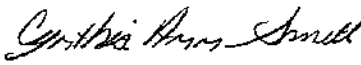
Expedited review of this minor change would be greatly appreciated.

The following are enclosed:

- Application for amended registration (Form 8570-1);
- Label with the proposed new text noted in blue (1 copy);
- Label with the proposed changes implemented (5 copies); and
- A CD with an electronic copy of the proposed amended label. The file name is 084565-00003.20111011.pdf .

I certify that the above referenced file on the enclosed CD has the same information as that on the enclosed paper copies of label. I certify that this statement is true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Sincerely,


Cynthia Ann Smith
Vice President
Agent for Bull Run Scientific, VBT

Enclosures

cc: G. Simpson, Bull Run Scientific, VBT

There is an **ELECTRONIC LABEL** for this action

You can use Acrobat to compare the e-label to the previous version (and find the changes). You can also use Acrobat to mark-up the e-label with your comments.

If e-label was submitted via

CD-ROM with paper application

then you will find e-label in

Electronic Label Library

If the e-label is not found in the ELL then it was probably not named correctly and could not be entered into the ELL. However, the file can be retrieved from the CD which is retained by the Front End.

or

If e-label was submitted via

XML E-Submission (no paper)

then you will find e-label in

Documentum

See overview of processing e-labels on other side of this sheet.

If you have any questions on e-labels, please contact one of your division e-label experts:

AD	Willie Abney	308-1689
	Renae Whitaker	308-7003
	Tracy Lantz	308-6415
BPPD		
RD	Tom Harris	308-9423

Material to be added to an e-Jacket/Jacket

Reg. No. 84565-3

1. ☒ Placement within the e-Jacket/jacket:

- ☐ Default: (chronological, top/newest)
 - ☐ Description: (PDF page number, i.e., "before page 45")
-
-

2. ☒ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☐ Notification
- ☐ New CSF
- ☒ Other: Final Printed Label

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Sylvester George

Phone: 703-603-0688 Division: BPPD

Date: 6/16/2010

April 20, 2010
HAND DELIVERED

Document Processing Desk
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard, 4th Floor
2777 South Crystal Drive
Arlington, VA 22202
Attn: Ms. Linda Hollis

Dear Ms. Hollis:

RE: Wasp Hornet and Yellowjacket Attractant System
EPA Registration No. 84565-3
Submission of Finished Printed Labels

This letter and the enclosures are submitted on behalf of Bull Run Scientific, LLC.

The Wasp Hornet and Yellowjacket Attractant System (EPA Registration No. 84565-3) was registered on February 3, 2010. The following are enclosed:

1. Application for registration form dated April 20, 2010 noting submission of finished printed labels; and
2. Three copies each of the finished printed labels for following alternate brand names, each with the above referenced EPA Registration Number:
 - a. AAA Trap for Wasps, Hornets & Yellowjackets (container labeling);
 - b. AAA Trap for Wasps, Hornets & Yellowjackets (trap insert); and
 - c. AAA Wasp Hornet Yellowjacket Attractant Kit.

Please note that Bull Run Scientific, LLC will NOT be directly marketing the above referenced product under the Bull Run Brand name. Instead, all marketing will be done via supplemental distributors. The "fill-in-the-blank" portions of the labels will be completed as appropriate for each supplemental distributor registration brand name product label.

Sincerely,



Cynthia Ann Smith
Vice President
Agent for Bull Run Scientific, VBT

cc: G. Simpson, Bull Run Scientific, VBT



United States
Environmental Protection Agency
Washington DC 20460

Registration
Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 84565-3	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Wasp Hornet Yellowjacket Attractant System	PM# 91	
5. Name and Address of Applicant (Include ZIP Code) Bull Run Scientific, VBT c/o Conn & Smith, Inc., Agent 6713 Catskill Road, Lorton, VA 22079-1113 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated February 3, 2010
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of finished printed labels for:

- a. AAA Trap for Wasps, Hornets & Yellowjackets (container labeling);
- b. AAA Trap for Wasps, Hornets & Yellowjackets (trap insert); and
- c. AAA Wasp Hornet Yellowjacket Attractant Kit.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container See page 2.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Cynthia Ann Smith	Title Agent for Bull Run Scientific, VBT	Telephone No. (Include Area Code) 703-339-1117
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Cynthia Ann Smith</i>	3. Title Agent for Bull Run Scientific, VBT	
4. Typed Name Cynthia Ann Smith	5. Date Apr 1 20 2010	

Receipt for Section 3

S: 873710

Registration: ☒ Yes ☐ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Print Letter

Application Type: Miscellaneous Receipt

Billable: ☒ Yes ☐ No

Enter More Information

Company: 84565 BULL RUN SCIENTIFIC, VBT

V

Tracking

Risk Manager: Biologicals & Pollution Prevention Division - PM Team 91

Product #: 84565-3 Product Name: WASP HORNET YELLOW JACKET ATTRACT

Overseas: ☐

Me Too
Section 3:

Me Too Product
Name:

Application Date: 20-Apr-2010



OPP Recvd Date: 21-Apr-2010



Front End Date: 21-Apr-2010



Risk Manager Send Date: 03-May-2010



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

View Ingredient: ☐

Receipt Description:

Final printed label.

Receipt Content

Des

Other

Final printed Label

View/Edit

Form A: ☐

Signature Date

Form B: ☐

Signature Date

Recvd
5/4/10
ACB

AAA Trap for Wasps, Hornets and Yellowjackets

The **AAA TRAP for WASPS, HORNETS & YELLOWJACKETS** and the **AAA ATTRACTANT KIT** are proven to lure and trap the following species: Paper Wasp (*Polistes fuscatus*), European Paper Wasp (*P. dominulus*), Golden Paper Wasp (*P. aurifer*), Paper Wasp (*P. metricus*), Red Wasp (*P. carolinus*), European Hornet (*Vespa crabro*), Bald-faced Hornet (*Dolichovespula maculata*), Aerial Yellowjacket (*D. arenaria*), Blackjacket (*Vespa consobrina*), California Yellowjacket (*V. sulphurea*), Common Yellowjacket (*V. vulgaris*), Eastern Yellowjacket (*V. maculifrons*), Forest Yellowjacket (*V. acadica*), German Yellowjacket (*V. germanica*), Northeastern Yellowjacket (*V. vidua*), Prairie Yellowjacket (*V. atropilosa*), Southern Yellowjacket (*V. squamosa*), Transition Yellowjacket (*V. flavopilosa*) and Western Yellowjacket (*V. pensylvanica*).

Keep Out of Reach
of Children
CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse. This product contains wasp, hornet and yellowjacket attractant. Wasp, hornet and yellowjacket stings can cause allergic reactions and death. Seek immediate medical attention if stung and an allergic reaction occurs.

FIRST AID

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.

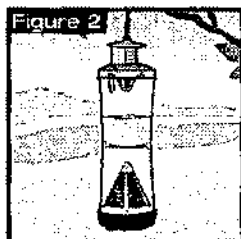
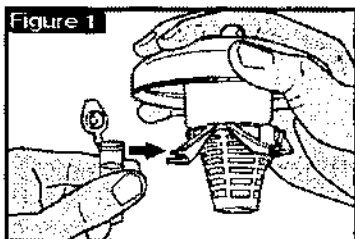
Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 AM to 4:30 PM Pacific Time.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For residential, commercial, and agricultural use. For non-food use only. Do not hang trap if you are allergic to wasp, hornet or yellowjacket stings.

Initial Setup

1. Remove twist-tie and enclosed Attractant Vial and Attractant Bottle from top chamber.
2. Remove Attractant Tube and felt pad from bottom chamber. (Leave cone in place.)
3. Bait the bottom chamber first:
 - a. Place felt pad into center of bottom cap.
 - b. Cut tip of Attractant Tube.
 - c. Carefully empty attractant liquid onto felt pad.
 - d. Screw bottom cap back in place.
 - e. Set trap on flat surface.
4. Next, bait the top chamber:
 - a. Remove Attractant Vial from its plastic pouch.
 - b. Pop open lid to Attractant Vial and snap into one of three notches next to the cone in the top cap. (Figure 1)
 - c. Pour Attractant Bottle contents into top chamber.
 - d. Add water to top chamber so solution reaches the Start Line. Add 1-2 drops dishwashing liquid to the water mixture.*
 - e. Thread twist-tie through hole on top cap.
 - f. Screw top cap back on and hang trap outdoors. (Figure 2)
5. Wash hands with soap and water.



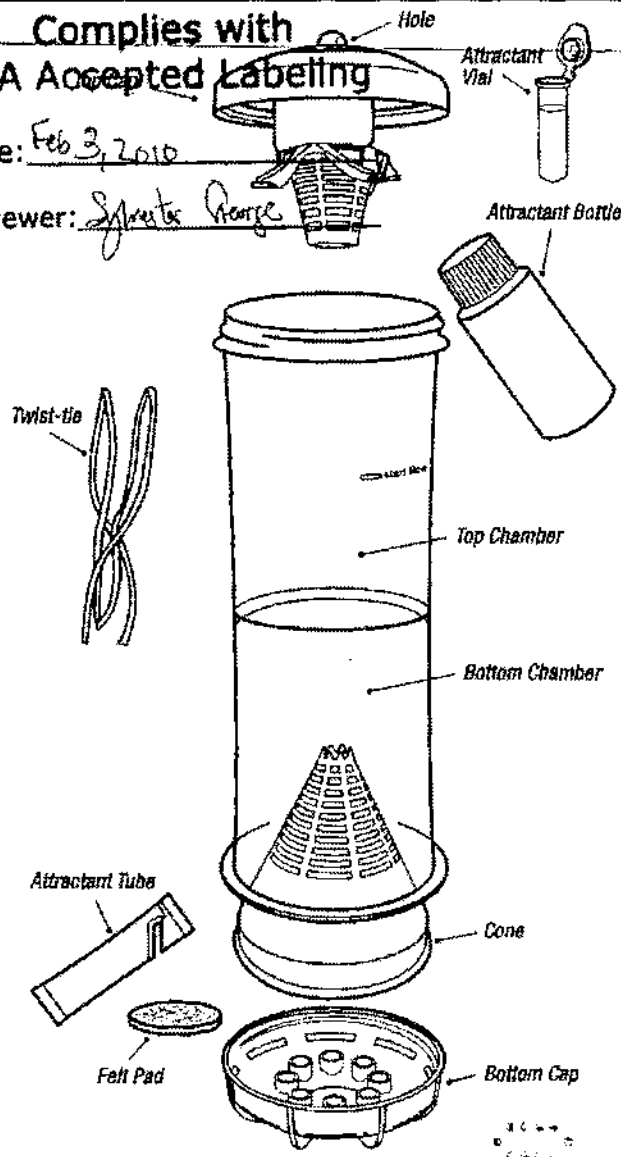
Trap Placement:

1. Hang trap outdoors, at least 20 feet away from plants grown for food or feed,

Complies with
EPA Accepted Labeling

Date: Feb 3, 2010

Reviewer: Syntex George



Catching the Queens:

Wasp, hornet and yellowjacket queens hibernate during the winter, then emerge to look for nest sites. Paper wasp queens are the first to emerge, usually in late winter. Hornet and yellowjacket queens emerge later, during the first warm days of spring. When you use the **AAA Trap** at that time, you can capture some queens and reduce the likelihood that a nest will be established nearby. Insects caught this early in the season may not be numerous, but each queen captured represents one less nest later on. Once queens begin nest building, the AAA Trap may have periods of lower catches until worker populations grow.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry, well-ventilated location out of reach of children and pets.

DISPOSAL: Deposit used attractant and attractant container in a

ATTRACTANT INCLUDED

0107412821 : ATTEMPT ARE UNESUCCESSFUL



AAA TRAP

for **WASPS, HORNETS
& YELLOWJACKETS**

LA TRAMPA PARA AVISPAS Y AVISPONES

Constituents	Ingredients	Constituents	Ingredients	Constituents	Ingredients
1 Tube	Active ingredient: Heptal Butyrate ... 99.8%	1 Vial	Active ingredient: 2-Alkyl-1-butanol ... 99.75%	1 Bottle	Active ingredient: Acetic Acid ... 8.0%
Net Wt.	Other ingredients ... 0.2%	Net Wt.	Other ingredients ... 0.25%	Net Wt.	Other ingredients ... 92.5%
0.85 g	Total ... 100.0%	0.85 g	Total ... 100.0%	0.88 g	Total ... 100.0%

Keep Out of Reach of Children • CAUTION See instructions inside for additional precautionary statements.
No se deje al alcance de los niños • Vea el interior para información preventiva

Another environmentally responsible product from

Bull RunScientific, VBT

AAA

WASP • HORNET • YELLOWJACKET **TRAP**



Non-toxic mode of action against target pests

Modo de acción no tóxico contra las plagas objetivo

Why guess which pest is bugging you? Now one trap does the trick. The Bull Run AAA Trap is the only trap proven to catch wasps, hornets and yellowjackets.

The combination of three attractants and the distinctive design of the AAA Trap have been developed by the Bull Run team of scientists and extensively tested over numerous years.

- No killing agents – insects either drown or dehydrate
- Attractant included - lasts two weeks
- No extra food bait required
- Catches queens in spring before they build nests
- Catches workers from summer through fall
- Double-chambered design keeps insects trapped
- Durable construction holds up for multiple seasons

Complete instructions inside.

www._____.com

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the Bull Run AAA Trap.

¿Para qué adivinar qué plaga lo está molestando? Ahora, una sola trampa se encarga de todo. La Trampa AAA de Bull Run es la única que atrapa avispa, avispas y incluso las avispas conocidas como "chaqueta amarilla".

La combinación de tres atrayentes y el distintivo diseño de la Trampa AAA han sido desarrollados por nuestro equipo de científicos y evaluados exhaustivamente durante varios años.

- No utiliza sustancias venenosas – los insectos se ahogan o se deshidratan
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- No requiere cebo adicional
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- Atrapa obreras desde el verano hasta finales del otoño
- El diseño de cámara doble mantiene atrapados a los insectos.
- La construcción duradera rinde por varias temporadas

Vea las instrucciones completas en el interior.

www._____.com

Visite nuestro sitio web para obtener más información sobre las distintas especies de avispas y avispas que caen en la Trampa AAA de Bull Run. Visite el sitio

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Bull Run Scientific, VBT

Model/Modelo WHYTR

The Bull Run AAA Trap is proven to catch the following species, identified below by their coloration and markings:
La Trampa AAA de Bull Run atrapa a las siguientes especies, identificadas a continuación según la coloración y las manchas:

Paper Wasps Avispas papeleras, Polistes



Paper Wasp
Polistes fuscatus



Golden Paper Wasp
Polistes aurifer



European Paper Wasp
Polistes dominulus



Red Wasp
Polistes carolina



Paper Wasp
Polistes metricus

Hornets Avispones



Bald-faced Hornet
Dolichovespula maculata



European Hornet
Vespa crabro

Yellowjackets

Avispas comunes o "chaqueta amarilla"



Aerial Yellowjacket
Dolichovespula areolaris



Blackjacket
Vespa consobrina



California Yellowjacket
Vespula sulphurea



Common Yellowjacket
Vespula vulgaris



Eastern Yellowjacket
Vespula maculifrons



Exotic Yellowjacket
Vespula ocadica



German Yellowjacket
Vespula germanica



Northeastern Yellowjacket
Vespula vidua



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CONTENTS	INGREDIENTS
1 TUBE NET WT. 0.05 oz	Active Ingredient: Heptyl Butyrate.....99.8% Other ingredients.....0.2% Total.....100.0%
1 VIAL NET WT. 0.05 oz	Active Ingredient: 2-Methyl-1-butanol.....59.75% Other ingredients.....40.25% Total.....100.00%
1 BOTTLE NET WT. 0.69 oz	Active Ingredient: Acetic Acid.....2.0% Other ingredients.....98.0% Total.....100.0%

DIRECTIONS FOR USE

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 - f. Screw top cap back on and hang trap outdoors. (Figure 2)
5. Wash hands with soap and water.

Figure 1

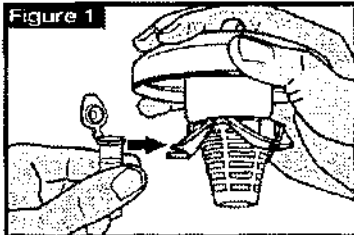
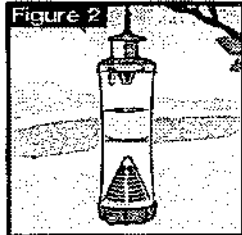
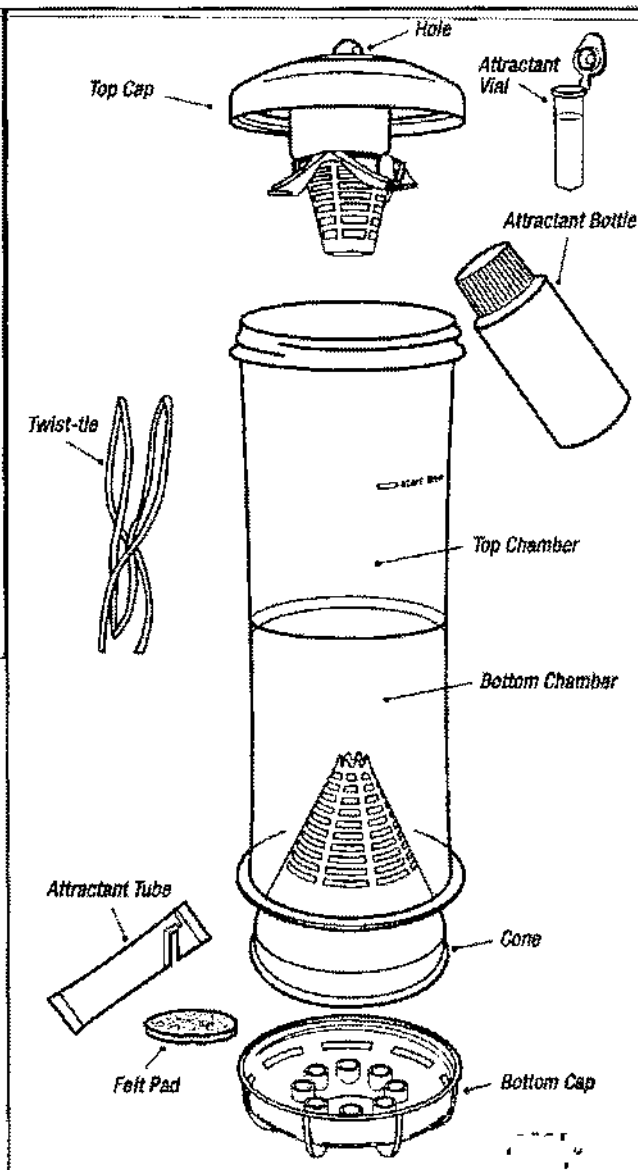


Figure 2



Trap Placement:

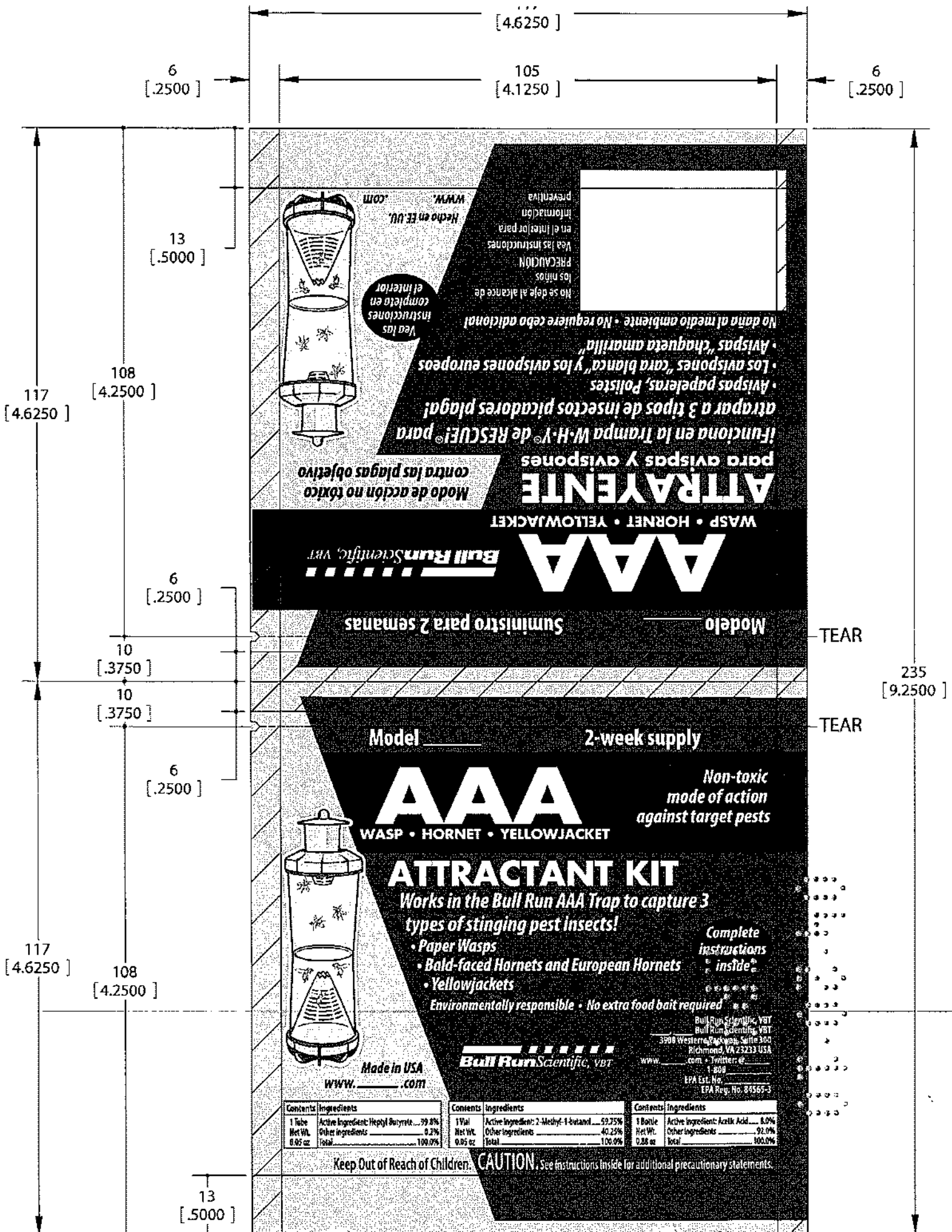


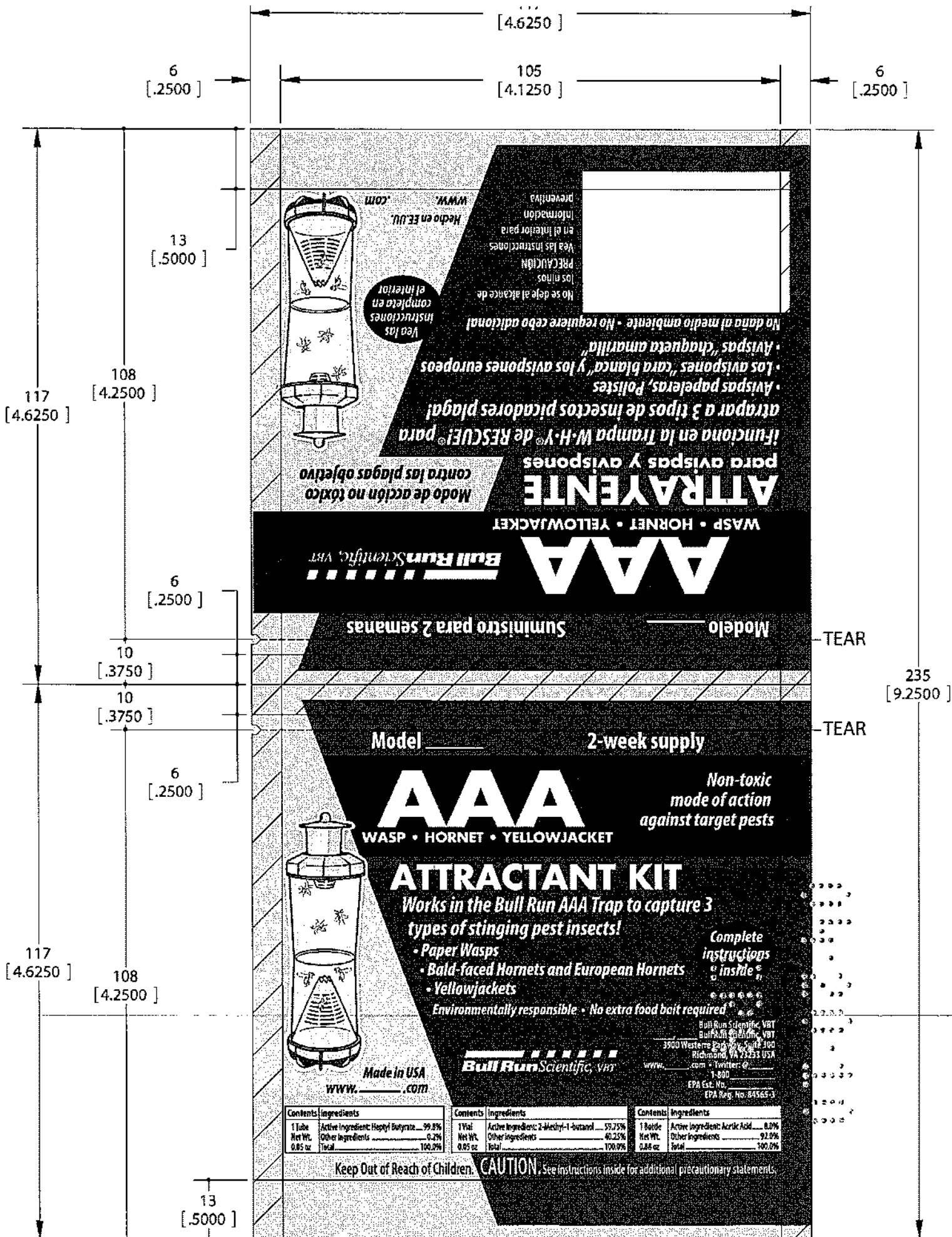
Catching the Queens:

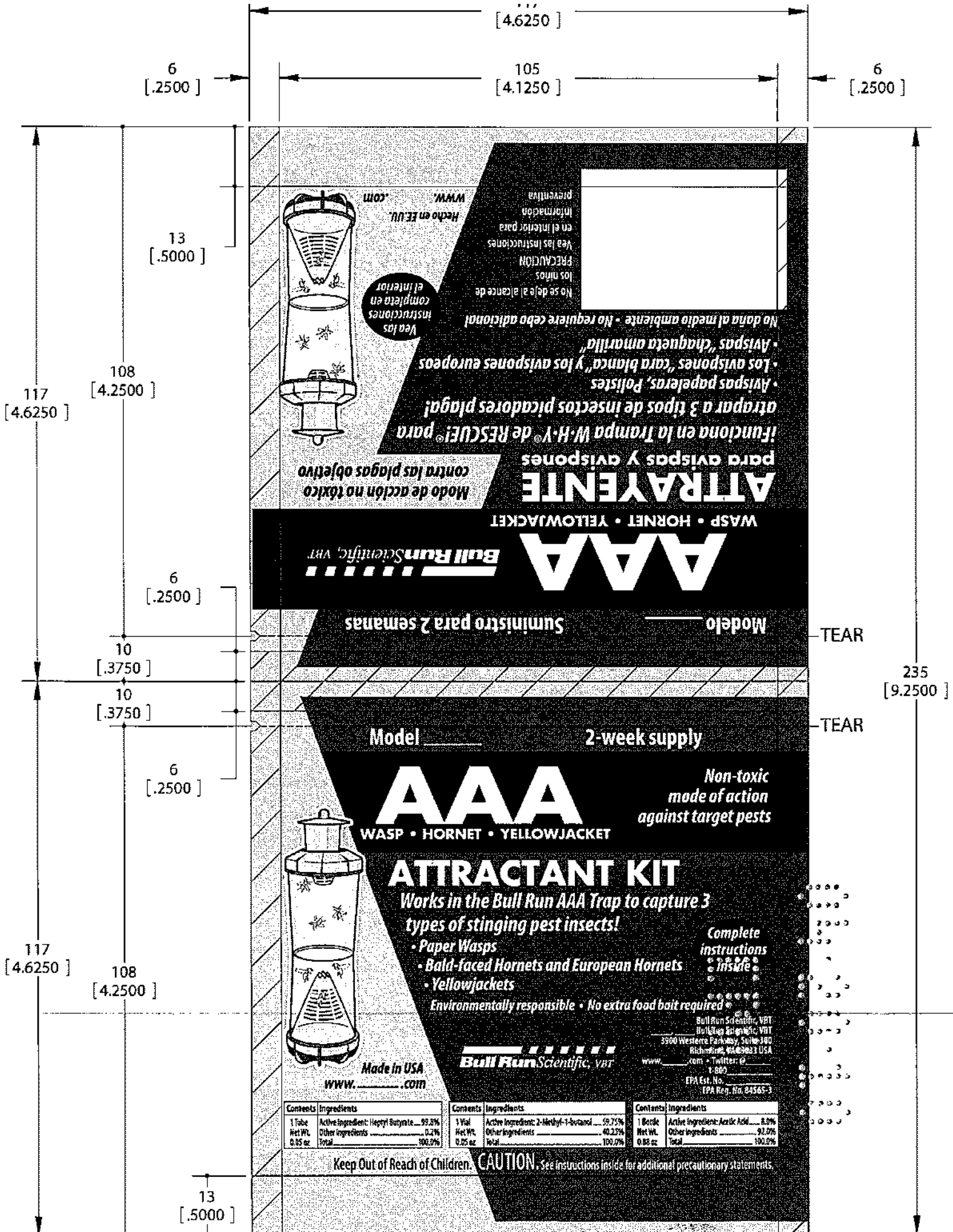
Wasp, hornet and yellowjacket queens hibernates during the winter, then emerge to look for nest sites. Paper wasp queens are the first to emerge, usually in late winter. Hornet and yellowjacket queens emerge later, during the first warm days of spring. When you use the **AAA Trap** at that time, you can capture some queens and reduce the likelihood that a nest will be established nearby. Insects caught this early in the season may not be numerous, but each queen captured represents one less nest later on. Once queens begin nest building, the **AAA Trap** may have periods of lower catches until worker populations grow.

STORAGE AND DISPOSAL

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STORAGE: Store in a cool, dry, well-ventilated location out of reach of children and pets.









AAA TRAP

**for WASPS, HORNETS
& YELLOWJACKETS**
LA TRAMPA PARA AVISPAS Y AVISPONES

Comments		Ingredients		Comments		Ingredients	
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Net Wt.	Other Ingredients... 0.2%	Net Wt.	Other Ingredients... 40.25%	Net Wt.	Other Ingredients... 91.0%		
0.05 oz	Total... 100.0%	0.05 oz	Total... 100.0%	0.001 oz	Total... 100.0%		

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WASP • HORNET • YELLOWJACKET **TRAP**

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Model/Modelo WHYTR



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Modo de acción no tóxico contra las plagas objetivo

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- No requiere cebo adicional
- Atrapa reinas en la primavera antes de que formen sus nidos
- Atrapa obreros desde el verano hasta finales del otoño
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Vea las instrucciones completas en el interior.

www._____.com

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Paper Wasp
Polistes fuscatus



Golden Paper Wasp
Polistes aurifer



European Paper Wasp
Polistes dominulus



Red Wasp
Polistes carolina



Paper Wasp
Polistes metricus

Hornets Avispones



Bald-faced Hornet
Dolichovespula maculata



European Hornet
Vespa crabro

Yellowjackets

Avispas comunes o "chaqueta amarilla"



Aerial Yellowjacket
Dolichovespula areolaris



Blackjacket
Vespa consobrina



California Yellowjacket
Vespa sulphurea



Common Yellowjacket
Vespa vulgaris



Eastern Yellowjacket
Vespa maculifrons



Far East Yellowjacket
Vespa asiatica



German Yellowjacket
Vespa germanica



Northeastern Yellowjacket
Vespa vidua



• REUSABLE •

ATTRACTANT INCLUDED

ATTRACTANTE - ATRACCORRER INCLUIDO



AAA TRAP

**for WASPS, HORNETS
& YELLOWJACKETS**
LA TRAMPA PARA AVISPAS Y AVISPONES

Contents	Ingredients
1 Tube	Active Ingredient: Heptyl Butyrate... 99.8%
Net Wt.	Other Ingredients... 0.2%
0.05 oz	Total... 100.0%

Contents	Ingredients
1 Vial	Active Ingredient: 2-Methyl-1-butanol... 59.75%
Net Wt.	Other Ingredients... 40.25%
0.05 oz	Total... 100.0%

Contents	Ingredients
1 Bottle	Active Ingredient: Acetic Acid... 8.0%
Net Wt.	Other Ingredients... 92.0%
0.88 oz	Total... 100.0%

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Texas Yellowjacket
Vespa acadicus



German Yellowjacket
Vespa germanica



Northeastern Yellowjacket
Vespa vidua




 United States
Environmental Protection Agency

 Office of Pesticide Programs (7505C)
 Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product
Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

 EPA Registration Number of Product
 84565-3

 Distributor Company Number
 49407

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Wasp Hornet and Yellow Jacket Attractant System

Distributor Product Name

WHY Attractant Kit

Name and Address of Distributor (Type; include ZIP code)

 Sterling International, Inc
 3808 N. Sullivan Rd., Bldg 16
 Spokane, WA 99216-1630

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

 VP operations
 Sterling International, Inc.

Date

March 9, 2010

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

 Manager
 Bull Run Scientific, VBT

Date

3/9/10


 United States
Environmental Protection Agency

 Office of Pesticide Programs (7505C)
 Washington, DC 20460

 ML
 3/15/10

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Office of Pesticide Programs
Biopesticides and Pollution Prevention Division (7511P)
1200 Pennsylvania Avenue NW
Washington, DC 20460

EPA Reg. Number:
84565-3

Date of Issuance:

03 Feb 2010

Term of Issuance: **Unconditional**

Name of Pesticide Product:

**Wasp Hornet and Yellow
Jacket Attractant
System**

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Conn & Smith, Inc.
Agent for Bull Run Scientific, VBT
6713 Catskill Road
Lorton, VA 22079-1113

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Biopesticides and Pollution Prevention Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This registration does not eliminate the need for continual reassessment of the pesticide. If EPA determines at any time, that additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under section 3(c)(2)(B) of FIFRA. This product is unconditionally registered in accordance with FIFRA Sec. 3(c)(5) provided you:

1. Submit and/or cite all data required for registration/ re-registration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Revise the EPA Registration Number to read, "EPA Reg. No. **84565-3.**"
3. Submit two (2) copies of the final printed labeling before you release the product for shipment. Refer to the A-79 enclosure for a further description of final printed labeling.

A stamped copy of the label is enclosed for your records.

Signature of Approving Official:

Keith A. Matthews, Acting Director,
Biopesticides and Pollution Prevention Division

Date:

03 Feb 2010

WASP HORNET YELLOWJACKET ATTRACTANT SYSTEM (EPA File Symbol 84565-G)

and Alternate Brand Names:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and

2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

JANUARY 29, 2010 PROPOSED MASTER LABEL

(Supersedes the November 6, 2009 version)

All Changes are Implemented

ACCEPTED

FEB 03 2010

Page 1 of 12

Under the Federal Insecticide, Fungicide
and Rodenticide Act, as amended, for
the pesticide registered under
EPA Reg. No. **84565-3**

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Notes:

- The WASP HORNET YELLOWJACKET TRAP SYSTEM contains three attractants, each with one active ingredient:
 - Heptyl butyrate (99.8%);
 - 2-Methyl-1-butanol (59.75%); and
 - Acetic acid (8.0%).
- The AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS includes the trap and the three attractants.
- The AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT is the attractant refill for the AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS and contains the three attractants without the trap.

and Alternate Brand Names:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

JANUARY 29, 2010 PROPOSED MASTER LABEL

(Superseded the November 6, 2009 version)

All Changes are Implemented

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS

1.1. Instructions

AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS INSTRUCTIONS

AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS

The AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS and the AAA ATTRACTANT KIT are proven to lure and trap the following species: Paper Wasp (*Polistes fuscatus*), European Paper Wasp (*P. dominulus*), Golden Paper Wasp (*P. aurifer*), Paper Wasp (*P. metricus*), Red Wasp (*P. carolina*), European Hornet (*Vespa crabro*), Bald-faced Hornet (*Dolichovespula maculata*), Aerial Yellowjacket (*D. arenaria*), Blackjacket (*Vespula consobrina*), California Yellowjacket (*V. sulphurea*), Common Yellowjacket (*V. vulgaris*), Eastern Yellowjacket (*V. maculifrons*), Forest Yellowjacket (*V. acadica*), German Yellowjacket (*V. germanica*), Northeastern Yellowjacket (*V. vidua*), Prairie Yellowjacket (*V. atropilosa*), Southern Yellowjacket (*V. squamosa*), Transition Yellowjacket (*V. flavopilosa*), Western Yellowjacket (*V. pensylvanica*).

CONTENTS	INGREDIENTS
1 TUBE	Active ingredient: Heptyl Butyrate 99.8%
NET WT:	Other ingredients 0.2%
0.05 oz	Total 100.0%
1 VIAL	Active ingredient: 2-Methyl-1-butanol 59.75%
NET WT:	Other ingredients 40.25%
0.05 oz	Total 100.00%
1 BOTTLE	Active ingredient: Acetic Acid 8.0%
NET WT:	Other ingredients 92.0%
0.88 oz	Total 100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse. This product contains wasp, hornet and yellowjacket attractant. Wasp, hornet and yellowjacket stings can cause allergic reactions and death. Seek immediate medical attention if stung and an allergic reaction occurs.

and Alternate Brand Names:

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2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

JANUARY 29, 2010 PROPOSED MASTER LABEL

(Superseded the November 6, 2009 version)

All Changes are Implemented

FIRST AID	
If in Eyes:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 AM to 4:30 PM Pacific Time.</p>	

DIRECTIONS FOR USE

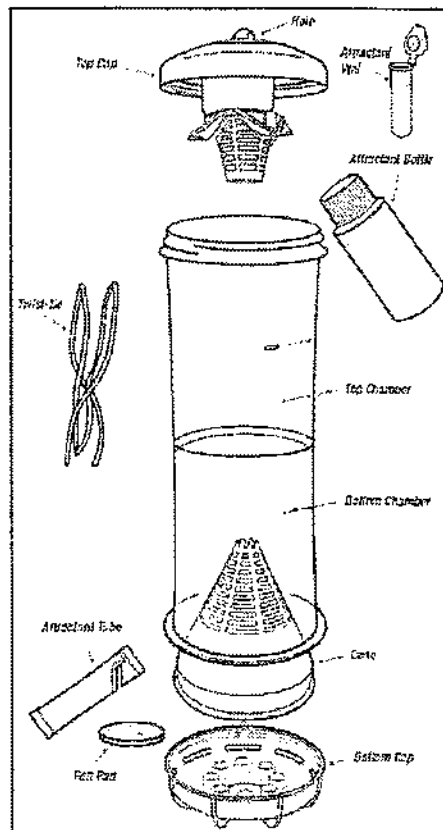
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For residential, commercial, and agricultural use. For non-food use only.

Do not hang trap if you are allergic to wasp, hornet or yellowjacket stings.

INITIAL SETUP

1. Remove twist-tie and enclosed Attractant Vial and Attractant Bottle from top chamber.
2. Remove Attractant Tube and felt pad from bottom chamber. (Leave cone in place.)
3. Bait the bottom chamber first:
 - a. Place felt pad into center of bottom cap.
 - b. Cut tip of Attractant Tube.
 - c. Carefully empty attractant liquid onto felt pad.
 - d. Screw bottom cap back in place.
 - e. Set trap on flat surface.
4. Next, bait the top chamber:
 - a. Remove Attractant Vial from its plastic pouch.
 - b. Pop open lid to Attractant Vial and snap into one of three notches next to the cone in the trap top cap. (Figure 1)
 - c. Pour attractant bottle contents into top chamber.
 - d. Add water to top chamber so solution reaches the Start Line. Add 1-2 drops dishwashing liquid to the water mixture*.
 - e. Thread twist-tie through hole on top cap.
 - f. Screw top cap back on and hang trap outdoors. (Figure 2)
5. Wash hands with soap and water.



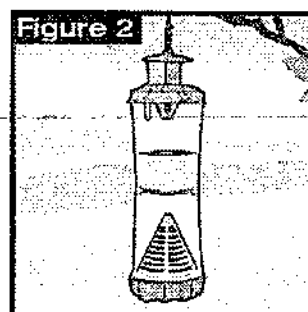
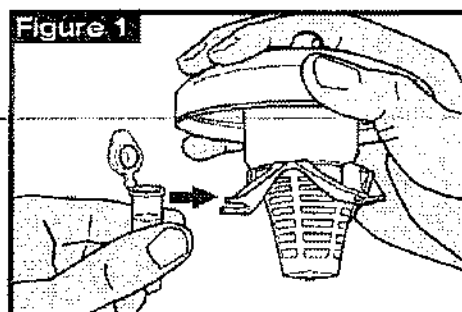
and Alternate Brand Names:

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2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

JANUARY 29, 2010 PROPOSED MASTER LABEL

(Superseded the November 6, 2009 version)

All Changes are Implemented



Trap Placement:

1. Hang trap outdoors, at least 20 feet away from plants grown for food or feed, building entries, and any known wasp, hornet or yellowjacket nests. Hang traps in late evening or early morning when wasps, hornets and yellowjackets are less active.
2. In extreme hot and dry weather, hang trap in the shade.

Top Chamber:

* Adding dishwashing liquid to the water mixture in the top chamber will coat the insects' wings and make it harder for them to fly once trapped. In hot and dry weather, liquid level in top chamber may evaporate below the Start Line before the attractant is due to be replaced. Do not add additional water to bring the liquid back up to the start line, as it will reduce attractant effectiveness.

Use Rate:

Use 2-4 traps for a 10,000 square foot area, or 8 to 16 traps per acre. For areas with heavy infestation, use a maximum of 48 traps per acre.

Reusing the Trap:

The attractants in the AAA Trap are designed to last 2 weeks. AAA Attractant Kit refills, which last an additional 2 weeks, should be available for purchase wherever the AAA trap is sold. Refills are also available through various online retailers; please visit www.aaa.com for details.

1. Check to make sure all trapped insects are dead.
2. Empty dead insects and wipe insect residue from trap. (Top chamber cannot be emptied of insects without replacing the attractant.)
3. Follow directions for baiting the bottom and top chambers in the initial setup instructions.

and Alternate Brand Names:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

JANUARY 29, 2010 PROPOSED MASTER LABEL

(Superseded the November 6, 2009 version)

All Changes are Implemented

Catching the Queens:

Wasp, hornet and yellowjacket queens hibernate during the winter, then emerge to look for nest sites. Paper wasp queens are the first to emerge, usually in late winter. Hornet and yellowjacket queens emerge later, during the first warm days of spring. When you use the AAA Trap at that time, you can capture some queens and reduce the likelihood that a nest will be established nearby. Insects caught this early in the season may not be numerous, but each queen captured represents one less nest later on. Once queens begin nest building, the AAA Trap may have periods of lower catches until worker populations grow.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry, well-ventilated location out of reach of children and pets.

DISPOSAL: Deposit used attractant and attractant packaging in trash for collection. Wash hands with soap and water.

Bull Run

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the Bull Run AAA Trap.

www._____.com

On Twitter? Follow us! Twitter.com/_____

Made in USA

Bull Run Scientific, VBT

3900 Westerre Parkway, Suite 300

Richmond, VA 23233 USA

1-800-_____-_____-

EPA Reg. No. 84565-____

EPA Est. No. _____

© _____, _____

and Alternate Brand Names:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

JANUARY 29, 2010 PROPOSED MASTER LABEL

(Superseded the November 6, 2009 version)

All Changes are Implemented

[Outer Panels of Instructions]

Bull Run

Bull Run Scientific, VBT
3900 Westerre Parkway, Suite 300
Richmond, VA 23233 USA

© _____, _____

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the Bull Run AAA Trap.

www._____.com

On Twitter? Follow us! Twitter.com/ _____

Made in USA

and Alternate Brand Names:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

JANUARY 29, 2010 PROPOSED MASTER LABEL

(Superseded the November 6, 2009 version)

All Changes are Implemented

1.2. Trap Front Panel Label**AAA Trap for Wasps, Hornets & Yellowjackets**

Reusable

Attractant included

Another environmentally responsible product from Bull Run

CONTENTS	INGREDIENTS
1 TUBE	Active ingredient: Heptyl Butyrate 99.8%
NET WT:	Other ingredients 0.2%
0.05 oz	Total 100.0%
1 VIAL	Active ingredient: 2-Methyl 1-butanol 59.75%
NET WT:	Other ingredients 40.25%
0.05 oz	Total 100.00%
1 BOTTLE	Active ingredient: Acetic Acid 8.0%
NET WT:	Other ingredients 92.0%
0.88 oz	Total 100.0%

KEEP OUT OF REACH OF CHILDREN. CAUTION.

See Instructions Inside for Additional Precautionary Statements.

1.3. Trap Side and Back Panel Label

Model _____

Bull Run AAA TRAP Wasp•Hornet•Yellowjacket Trap [Product Name Logo]

Why guess which pest is bugging you? Now one trap does the trick. The Bull Run AAA Trap is the only trap proven to catch wasps, hornets and yellowjackets.

The combination of three attractants and the distinctive design of the AAA Trap have been developed by the Bull Run team of scientists and extensively tested over numerous years.

Catches 19 species of stinging pest insects in one trap

5 species of Paper Wasps

Bald-faced Hornets and European Hornets

12 species of Yellowjackets

Non-toxic mode of action against target pests

No killing agents — insects either drown or dehydrate

Reusable

and Alternate Brand Names:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

JANUARY 29, 2010 PROPOSED MASTER LABEL

(Superseded the November 6, 2009 version)

All Changes are Implemented

Attractant included - lasts two weeks

Another environmentally responsible product from Bull Run

No extra food bait required

~~Catches queens in spring before they build nests~~

Catches workers from summer through fall

Double-chambered design keeps insects trapped

Durable construction holds up for multiple seasons

Complete Instructions Inside.

Visit www._____.com to learn more about our other insect traps and attractants.

On Twitter? Follow us! [Twitter.com/_____](https://twitter.com/_____)

Made in USA

Bull Run Scientific, VBT

3900 Westerre Parkway, Suite 300

Richmond, VA 23233 USA

1-800-____-____

EPA Reg. No. 84565-____

EPA Est. No. _____

© _____, _____

U.S. Patent# _____. Other domestic and international patents pending

www._____.com

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the AAA Trap.

and Alternate Brand Names:

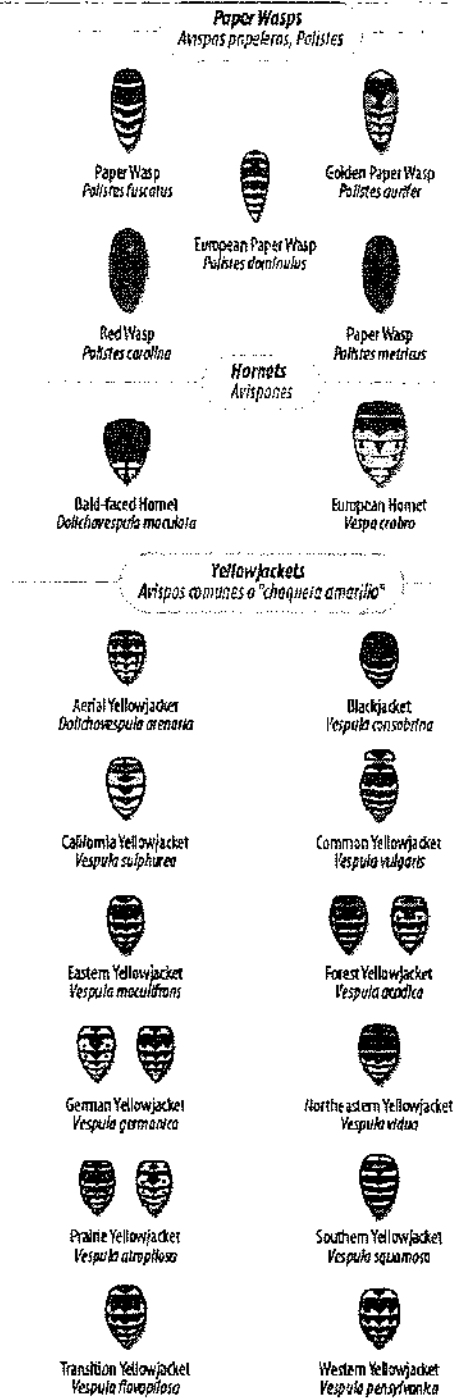
1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

JANUARY 29, 2010 PROPOSED MASTER LABEL

(Superseded the November 6, 2009 version)

All Changes are Implemented

The Bull Run AAA Trap is proven to catch the following species, identified below by their coloration and markings:



and Alternate Brand Names:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
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JANUARY 29, 2010 PROPOSED MASTER LABEL

(Superseded the November 6, 2009 version)

All Changes are Implemented

Wondering which of these insects are in your area? Find out at www._____.com

1.4. Attractant Tube Container Label

ATTRACTANT TUBE

CAUTION: KEEP OUT OF REACH OF CHILDREN

www._____

1.5. Attractant Vial Container Label

[Product Name Logo] **ATTRACTANT VIAL**

CAUTION: KEEP OUT OF REACH OF CHILDREN

www._____

1.6. Attractant Bottle Container Label

[Product Name Logo] **ATTRACTANT BOTTLE**

CAUTION: KEEP OUT OF REACH OF CHILDREN

Causes moderate eye irritation.

Keep away from eyes and skin. Wash hands after handling product.

www._____

and Alternate Brand Names:

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

JANUARY 29, 2010 PROPOSED MASTER LABEL

(Superseded the November 6, 2009 version)

All Changes are Implemented

2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT**2.1. Instructions**

See Section 1.1.

2.2. Front Panel Label

Model _____

Bull Run

AAA
WASP HORNET YELLOWJACKET
ATTRACTANT KIT

2 week supply

Works in the Bull Run AAA Trap to capture 3 types of stinging pest insects!

Paper Wasps

Bald-faced Hornets and European Hornets

Yellowjackets

Environmentally responsible

No extra food bait required

Non-toxic mode of action against target pests

No killing agents — insects either drown or dehydrate

Lures queens & workers, spring to fall

CONTENTS	INGREDIENTS	
1 TUBE	Active ingredient: Heptyl Butyrate	99.8%
NET WT:	Other ingredients	0.2%
0.05 oz	Total	100.0%
1 VIAL	Active ingredient: 2-Methyl-1-butanol	59.75%
NET WT:	Other ingredients	40.25%
0.05 oz	Total	100.00%
1 BOTTLE	Active ingredient: Acetic Acid	8.0%
NET WT:	Other ingredients	92.0%
0.88 oz	Total	100.0%

KEEP OUT OF REACH OF CHILDREN. CAUTION.

See Instructions Inside for Additional Precautionary Statements.

and Alternate Brand Names:

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JANUARY 29, 2010 PROPOSED MASTER LABEL

(Superseded the November 6, 2009 version)

All Changes are Implemented

www._____.com

The AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT is proven to lure the following species: ~~Paper Wasp (*Polistes fuscatus*)~~, ~~European Paper Wasp (*P. dominulus*)~~, ~~Golden Paper Wasp (*P. aurifer*)~~, Paper Wasp (*P. metricus*), Red Wasp (*P. carolina*), European Hornet (*Vespa crabro*), Bald-faced Hornet (*Dolichovespula maculata*), Aerial Yellowjacket (*D. arenaria*), Blackjacket (*Vespula consobrina*), California Yellowjacket (*V. sulphurea*), Common Yellowjacket (*V. vulgaris*), Eastern Yellowjacket (*V. maculifrons*), Forest Yellowjacket (*V. acadica*), German Yellowjacket (*V. germanica*), Northeastern Yellowjacket (*V. vidua*), Prairie Yellowjacket (*V. atropilosa*), Southern Yellowjacket (*V. squamosa*), Transition Yellowjacket (*V. flavopilosa*), Western Yellowjacket (*V. pensylvanica*).

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the Bull Run AAA Trap. www._____.com

On Twitter? Follow us! Twitter.com/_____

Complete instructions inside.

Made in USA

Bull Run Scientific, VBT

3900 Westerre Parkway, Suite 300

Richmond, VA 23233 USA

1-800-_____-_____

© _____, _____

www._____.com Twitter:@_____

EPA Reg. No. 84565-__

EPA Est. No. _____

US Patent#_____. Other domestic and international patents pending.

2.3. Attractant Vial Container Label

See Section 1.4.

2.4. Attractant Bottle Container Label

See Section 1.5.

2.5. Attractant Tube Container Label

See Section 1.6.

BPPD Old Active Ingredient Checklist

New Product Registration/Existing Product Amendment

Fast Track ☐ PRIA Actions B650 ☐, B660 ☐, B670 ☐, B672 ☒, B680 ☐, B681 ☐, B710 ☐,

B720 ☐, B721 ☐, B730 ☐, B880 ☐, B881 ☐, B890 ☐, & B900 ☐

EPA Reg. No.: 84565-G RAL: Diss Benmhend Application Date: 6/16/08

Checklist		
1.	Application Form (EPA Form 8570-1) - signed & complete including package type? IF NO, STOP! Call applicant and have them correct application and resubmit.	✓
2.	If amendment, was final printed labeling received for previous action? IF NO, STOP! E-mail applicant and request final printed labeling.	✓
3.	Confidential Statement of Formula (CSF) EPA Form 8570-4 Basic Formula <input checked="" type="checkbox"/> Alternate Formula(s) <input type="checkbox"/>	✓
a.	CSF Review completed? IF YES, SKIP to ITEM 4.	✓
b.	CSF is signed and dated? IF NO, CALL APPLICANT.	
c.	Completely filled out: CAS numbers, pH, flashpoint, flammability, if applicable?	
d.	Are the totals accurate?	
e.	Certified limits agree with 40 CFR 158.175? Note that if preliminary or 5 batch analysis differ from Section 158.175(b), limits based on batch analysis would need to be proposed under Section 158.175(c).	
f.	Viability (if live microbial, i.e., cfu/gram)? NA <input type="checkbox"/>	
g.	PC codes assigned on CSF for actives & inerts plus 40 CFR 180.910, 180.920, and 180.930 codes noted for products that have food or feed uses?	
h.	List 1 inert ingredient(s) present in the formulation? If YES, be sure it is listed on the label.	
i.	Alternate formula(s) do not require different labeling from basic CSF or other alternate CSFs per 40 CFR 152.43(b)(3). NA <input type="checkbox"/>	
j.	Source for a.i. is a registered pesticide? (When a proposed alternate or new basic formula involves a new registered manufacturing-use product as the active ingredient source it must be determined whether the manufacturing-use products used to formulate are similar enough to warrant use of existing product specific data such as acute toxicity.)	
k.	Does CSF list peanuts, tree nuts, milk, soybeans, eggs (including putrescent eggs), fish, crustacea, or wheat commodities? IF YES, RAL must evaluate label directions for compliance with 40 CFR 180.1071.	
4.	Data and Data Matrix present. (EPA Form 8570-35)	
a.	a) Using Selective Method? [IF NO, SKIP to item 5 and note that data matrix should be used for the cite-all method to indicate the companies to whom offers of compensation were made.]	
b.	Complete Data Matrix supporting both the product registration and, if applicable, the	✓

	proposed amendment. Minimum Data Matrix for registration includes: product specific acute toxicity, product chemistry, and efficacy data for public health pests claimed on label.	✓	
c.	Adequate product specific data submitted?	✓	
d.	Registered source used for active ingredient? IF YES, SKIP to ITEM 5. (If active ingredient is from a registered source (manufacturing-use product), generic data should be satisfied by registered source.) IF NO or if use not supported by registered source, generic data is necessary.	✓	
c.	Data passed PR Notice 86-5 for formatting and MRJD number assignment?		
f.	Public copy of Data Matrix provided? (PRN 98-5)		
5.	Certification with Respect to Citation of Data (EPA Form 8570-34): See 40 CFR 152.80-98 and PR Notice 98-5 [Note: If no data are required or submitted, form is not needed. This is often true for minor amendments.]		
a.	Did applicant check a Method of Support?	✓	
b.	General Offer to Pay checked for Cite-all Method or Cite-all under Selective Method?		
c.	Is the form signed and dated?	✓	
d.	Check form and Data Matrix; are Exclusive Use data cited from other sources?		
e.	IF YES , is the required authorization letter included in application?		
6.	Formulators Exemption (EPA Form 5870-27)		
a.	If registrant is using a registered source active ingredient in the formulation (manufacturing-use product), is form filled out completely and signed? NA <input type="checkbox"/>	✓	
7.	Exclusive Use Notice Requirement Prior to Registration (Required per 40 CFR 152.116, separate from permission of an exclusive use data submitter to rely on exclusive use data) Is this an exclusive use active ingredient or mix of active ingredients (registered w/in last 10 yrs)? If YES, go to a) or b) below.		
a.	a) Has a notification of intent to register letter or email been sent to the exclusive use data submitter(s) at least 30 days before registration? (This notification is required for all methods of data support except when the exclusive use data submitter(s) product is used to formulate and the formulator's exemption is claimed.)		
b.	Has exclusive use data submitter requested during 30 day period the applicants' list of data requirements and method of compliance?		
c.	Has registrant submitted certification from exclusive use data submitter that submitter is aware of the application and does not object to the registration?		
8.	Science Review completed? Comments:	✓	

9.	Label(s) Review <u>Date of Label Review:</u>		
a.	Label(s) in conformance with current <i>Label Review Manual</i> and appropriate REDS.	✓	
b.	Labeling statements and claims are supported by Acute Toxicity, Product Chemistry data (or acceptable waivers). Acceptable efficacy studies support public health pests claimed on label.	✓	
c.	Nominal concentration of active ingredient shown in ingredients statement.	✓	
d.	Viability included as sub-statement of Ingredient Statement (if live microbial, i.e., cfu/gram).	✓	
e.	Storage and disposal instructions agree with container types listed on application form.	✓	
f.	Unique Product Name for Same Company (Check OPPIN).	✓	
g.	Does CSF list peanuts, tree nuts, milk, soybeans, eggs (including putrescent eggs), fish, crustacea, or wheat commodities? If YES, RAL must evaluate label use directions for compliance with 40 CFR 180.1071.	✓	
h.	Does label bear "National Organic Program" (PR Notice 2003-1) or OMRI claims?		✓
i.	If YES, National Organic Program or OMRI claims approved by Chris Pfeifer? NA <input type="checkbox"/>		
	Labeling is acceptable. Corrections or changes are NOT necessary.	✓	
j.	Comments: label revised & submitted.		
10.	If new use sites are being added, are they subject to OPP's process for public involvement in pesticide registration actions?		✓
11.	BPPD Registration with Conditions/Terms Logbook		✓
a.	Type of Registration: Conditional or Unconditional		
b.	Does this registration have terms/conditions (ex: storage stability data)? IF THE REGISTRATION HAS TERMS/CONDITIONS THIS INFORMATION MUST BE ENTERED INTO THE <u>LOGBOOK For BPPD Registrations with Terms/Conditions</u> FOR THE APPROPRIATE BRANCH.		✓
c.	If there are term/conditions to the registration notice has this information been placed in the <u>LOGBOOK For BPPD Registrations with Terms/Conditions</u>		



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: June 17, 2009

SUBJECT: Science Review in Support of the Registration of Wasp Hornet Yellowjacket Attractant System, Containing 59.75% w/w 2-Methyl-1-Butanol (Vial), 99.8% Heptyl Butyrate (Tube), and 8.0% Acetic Acid (Bottle) As Its Active Ingredients.

Decision Number:	395119
DP Number:	357196
EPA File Symbol Number:	84565-G
Chemical Class:	Biochemical
PC Codes:	431602, 100247, 044001
CAS Numbers:	137-32-6, 5870-93-9, 64-19-7
Active Ingredient Tolerance Exemptions:	Non-Food Use Product
MRID Numbers:	

FROM: Jacob Moore, Chemist /s/ 06/17/09 *Jacob L. Moore*
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THROUGH : Russell S. Jones, Ph.D. Senior Biologist /s/ 06/17/09 *Russell S. Jones*
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

ACTION REQUESTED

In response to the request for additional information discussed in a memorandum from J. Moore to D. Benmhend dated 04/16/09 and relayed in a letter from BPPD to the registrant dated 05/15/09, the registrant has submitted CSFs dated 05/22/09, description of product trap, and primary eye irritation data waiver rationale.

2-Methyl-1-Butanol, Heptyl Butyrate, Acetic Acid
PC Code: 431602, 100247, 044001

DP Number: 357196
EPA Reg. No.: 395119.

RECOMMENDATIONS AND CONCLUSIONS

1. The CSFs dated 05/22/09 are **ACCEPTABLE**.

2. More description was requested from the registrant on the overall physical shape of the Attractant Vial and Attractant System trap. The registrant has submitted an **ACCEPTABLE** description of the trap system and attractant vial, including illustrations on how the trap system is constructed and used.
3. Some concern was raised about the concentration of acetic acid handled by the applicator. The registrant has clarified that the user only handles 8% acetic acid w/w in the Wasp Hornet Yellowjacket Attractant System Bottle. Therefore, the waiver rationale for primary eye irritation is **ACCEPTABLE**.

cc: J. Moore, R. Jones, D. Benmhend, BPPD Chron File, IHAD/ARS
J. Moore, FT, PY-S: 06/17/09

November 12, 2009
HAND DELIVERED

Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202
Attn: Driss Benmhend

Dear Driss:

Re: AAA Wasp Hornet Yellowjacket Attractant System (File Symbol 84565-G)
Submission of Updated Data Matrix

This letter and the enclosures are submitted on behalf of Bull Run Scientific, VBT.

Enclosed are the Agency internal use and public file copies of the data matrix for the Attractant Tube (containing heptyl butyrate) of the AAA Wasp Hornet Yellowjacket Attractant System (File Symbol 84565-G). Please note that the data matrix has been updated to include the eye irritation report (MRID No. 47805401) that was submitted on July 14, 2009.

We look forward to the registration of the AAA Wasp Hornet Yellowjacket Attractant System. I will be pleased to pick up the stamped accepted label and thereby avoid the delays associated with the U.S. Mail.

Sincerely,



Cynthia Ann Smith
Vice President
Agent for Bull Run Scientific, VBT

Enclosures (2)

cc: G. Simpson, Bull Run Scientific, VBT

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date	November 12, 2009	EPA Reg No./File Symbol	84565-G	Page 1 of 7	
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 3900 Westerre Parkway, Suite 300, Richmond, VA 23233		Product Yellowjacket Attractant (EP) of the AAA Wasp Hornet Yellowjacket Attractant System and Heptyl Butyrate TGAI			
Ingredient		Heptyl butyrate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Please see the attached pages.		
Signature	Name and Title		Date		
<i>Cynthia Ann Smith</i>	Cynthia Ann Smith, Agent for Bull Run Scientific, VBT		Nov. 12, 2009		

DATA MATRIX							
Date November 12, 2009				EPA Reg No./File Symbol 84565-G		Page 2 of 7	
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 3900 Westerre Parkway, Suite 300, Richmond, VA 23233				Product Yellowjacket Attractant (EP) of the AAA Wasp Hornet Yellowjacket Attractant System and Heptyl Butyrate TGA			
Ingredient Heptyl Butyrate							
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note

DATA MATRIX							
Date November 12, 2009				EPA Reg No./File Symbol 84565-G		Page 3 of 7	
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 3900 Westerre Parkway, Suite 300, Richmond, VA 23233				Product Yellowjacket Attractant (EP) of the AAA Wasp Hornet Yellowjacket Attractant System and Heptyl Butyrate TGAI			
Ingredient Heptyl Butyrate							
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note

DATA MATRIX							
Date November 12, 2009				EPA Reg No./File Symbol 84565-G		Page 4 of 7	
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 3900 Westerre Parkway, Suite 300, Richmond, VA 23233				Product Yellowjacket Attractant (EP) of the AAA Wasp Hornet Yellowjacket Attractant System and Heptyl Butyrate TGA1			
Ingredient Heptyl Butyrate							
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note

DATA MATRIX							
Date November 12, 2009				EPA Reg No./File Symbol 84565-G		Page 5 of 7	
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 3900 Westerre Parkway, Suite 300, Richmond, VA 23233				Product Yellowjacket Attractant (EP) of the AAA Wasp Hornet Yellowjacket Attractant System and Heptyl Butyrate TGA1			
Ingredient Heptyl Butyrate							
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note

DATA MATRIX							
Date November 12, 2009				EPA Reg No./File Symbol 84565-G		Page 6 of 7	
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 3900 Westerre Parkway, Suite 300, Richmond, VA 23233				Product Yellowjacket Attractant (EP) of the AAA Wasp Hornet Yellowjacket Attractant System and Heptyl Butyrate TGA1			
Ingredient Heptyl Butyrate							
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note

DATA MATRIX							
Date November 12, 2009				EPA Reg No./File Symbol 84565-G		Page 7 of 7	
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 3900 Westerre Parkway, Suite 300, Richmond, VA 23233				Product Yellowjacket Attractant (EP) of the AAA Wasp Hornet Yellowjacket Attractant System and Heptyl Butyrate TGA1			
Ingredient Heptyl Butyrate							
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note



84565-G - Confirmation of new PRIA due date for Bull Run Wasp Hornet
Yellowjacket Attractant System


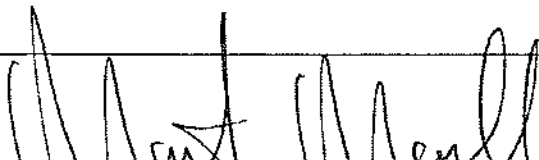
Andrew Bryceland to: cindy
Cc: Driss Benmhend, Linda Hollis

07/01/2009 10:57 AM

Dear Ms. Smith,

This email is to confirm the agreement made between the Agency and your company to extend the Pesticide Registration Improvement Act (PRIA) decision time review period for the above referenced action B672. To allow time for Agency review, the original PRIA decision time period ending July 3, 2009 has now been extended until February 8, 2010.

Regards,
Andrew Bryceland
Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division
USEPA

Recommendation of Division Directors Negotiated Due Dates		
Decision#: 395119	Registration#: 84565-G	Petition: N/A
Fee Category: B 672	PRIA Decision Time Frame: 12 months	
Submitted by: Driss Benmhend	Branch: BPB	Date: June 16, 09
Company: Bull Run Scientific, VBT		
Original Due Date: July 03, 09	Proposed New Due Date: February 08, 2010	
Previous Negotiated Due Dates: NA		
Is the "Fix" in-house? No	If not, date "Fix" expected by June 26, 2009 <i>rec'd 6-29-09</i>	
Issue (describe in detail): This product contains an unregistered new active ingredient (2-methyl 1-butanol). BPPD reviews identified deficiencies relating to product chemistry, acute toxicity and efficacy issues. A deficiency letter was mailed to the applicant on May 22, 2009.		
Summary of Deficiency Type(s): Not Submitted (N) Deficiencies (D) Product Chemistry: <u>D</u> Efficacy: <u>D</u> Labeling: <u> </u> Other (describe): Unacceptable acute toxicity waiver requests <u> </u>		
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates): The registrant was notified by a letter sent on May 22, 2009 that the review of the recent data submitted did not support the application. Upon receipt of the deficiency letter, the registrant requested a meeting with BPPD. During a teleconference held on June 16, 2009, BPPD explained in more details, the deficiencies listed in the letter. The applicant promised to address the deficiencies and send a revised submission by the first week of June 26, 2009. The applicant was also cooperative over the fact the PRIA due date will have to be renegotiated, and sent an e-mail with a new PRIA due date of February 08, 2010.		
"75 Day" Letter sent? <u> X </u> Yes <u> </u> (Date sent) January 07, 2009 <u> </u> No and reason for none?		
Rationale for Proposed Due Date: BPPD will need about nine months to complete the review, register the new active ingredient 2-methyl 1-butanol, and make a regulatory decision for this B 672 action.		
Registrant notified that this is the last negotiation? Yes <u> X </u> Not Applicable		
Approve: 	Disapprove:	
If disapproved, action to be taken:		
OD or DOD Signature: 	Date: 6.30.09	



UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY

Washington, D.C. 20460
MAY 15 2009

Cynthia Ann Smith
Agent for Bull Run Scientific, VBT
6713 Catskill Road
Lorton, VA 22079-1113

Subject: Application to Register Wasp Hornet and Yellow Jacket Attractant System
EPA File Symbols: 84565-G
Your application dated June 16, 2008
Decision Number: 395119
PRIA Code: B 672
PRIA Due Date: July 03, 2009

Dear Ms. Smith:

The Bi
application ref
section 3(c)(5)
following defi
submission ar

BPPD CONC

I P
st

a

Will need Re-negoti
based on Chris's
TGAI

- b. The purity of 2-methyl-1-butanol TGAI is corrected in Parts 2 and 3 of the CSF. Parts 2 and 3 list the purity as [REDACTED]
- c. The purity and certified limits of 2-methyl-1-butanol must be in the same row as the % by weight of 2-methyl-1-butanol.

Manufacturing process information may be entitled to confidential treatment

- d. The nominal percent by weight of 2-methyl-1-butanol must read "59.72" or "59.7" instead of "59.75". If not, a rationale must be provided for the presented nominal concentration.
 - e. The nominal certified limits for 2-methyl-1-butanol must read "61.51" or "61.5" and "57.93" or "57.9" instead of "61.54" and "57.96". If not, a rationale must be provided for the presented nominal certified limits.
-
- f. The lower certified limit for [REDACTED]
 - g. The nominal concentration of acetic acid must read "7.96" instead of "8.00".
 - h. The certified limits for acetic acid must read "8.36" and "7.56" instead of "8.40" and "7.60".
 - i. The Attractant Vial and Attractant System trap must be adequately described. More information must be provided on the bottom chamber and the overall shape of the System trap. The only information provided on the Attractant Vial is that it is a "snap-cap". More information about the size and shape of the Attractant Vial must be provided

II. **Tier I Toxicity Data is unacceptable.** The data submitted cites for a 97% solution of acetic acid, which would warrant Toxicity Category I or II language on the label, due to eye irritation. Even though the EP is contained in a trap, some dermal and eye exposure can occur due to the refill kits. To upgrade this data to an acceptable level, you must provide rationale on why Toxicity Category III or IV language is being used on the label or submit data in support of Toxicity Category III or IV label language.

III. This product contains two new active ingredient heptyl butyrate and 2-methyl-1-butanol. Therefore the registration of this product is dependent on resolution of deficiencies and the approval of the application to register the TGAIs for heptyl butyrate and 2-methyl-1-butanol (84565-U and 84565-T).

BPPD did not perform a complete label review because the application contains deficiencies. When the deficiencies listed above are addressed and satisfied, BPPD will then proceed with a thorough label review and inform you of any label revisions that may be required.

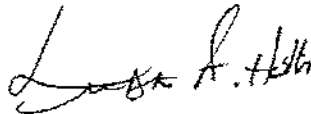
Your application as submitted under the Pesticide Registration Improvement Act (PRIA) and new PRIA Code guarantees you a regulatory decision for the action category B672 of 12 months and a decision due date of July 03, 2009. By regulation, the Agency is obligated to give you 75 days (40 CFR 152.105) in which to address the deficiencies identified above. However, based on the deficiencies listed above, we may likely need to

renegotiate the PRIA decision due date in order for you to address and submit the information requested, and for BPPD to complete the review and make regulatory decision, before the PRIA decision date of July 03, 2009. Please contact Driss Benmhend upon receipt of this letter to determine when you will be able to address these deficiencies and resubmit the information so that a new PRIA due date can be established.

Alternatively, you may withdraw the application and resubmit when you have all the information or the Agency will issue "a cannot grant" letter under PRIA. You will still have 75 days from the date of this letter to submit the required information before the Agency would withdraw your application because it is incomplete.

If the Agency issues a letter stating it cannot grant your application under PRIA and you submit the required information within 75 days, the Agency will continue to work on your application, but it will not be subject to the PRIA time frame. Please contact the regulatory action leader, Driss Benmhend, at (703) 308-9525 or benmhend.driss@epa.gov within 15 days from the date of this letter with your response as to whether or not you will opt to renegotiate the due date for this product based on when you will be able to: (a) address the deficiencies and (b) resubmit the application to the Agency.

Sincerely,



Linda A. Hollis, Chief,
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: April 16, 2009

SUBJECT: Science Review in Support of the Registration of 2-methyl-1-butanol.

Decision Number:	395119
DP Number:	357196
EPA File Symbol Number:	84565-G
Chemical Class:	Biochemical
PC Code:	431602
CAS Number:	137-32-6
Active Ingredient Tolerance Exemptions:	Non Food-Use Product
MRID Numbers:	474570-01 to -07, 47457301

FROM: Jacob Moore; Chemist /s/ 04/16/09 *J. Moore*
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THROUGH : Russell S. Jones, Ph.D. Senior Biologist /s/ 04/16/09 *R. S. Jones*
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P) 4/17/2009

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION

ACTION REQUESTED

Bull Run Scientific, VBT requests registration of 2-methyl-1-butanol, which is intended for use as a wasp, hornet, and yellowjacket attractant. In support of this registration, the registrant has submitted CSF dated 06/14/2008, product chemistry in MRIDs 474570-01 to -05, toxicity and non-target organism rationale in MRIDs 47457006 and 47457007, and efficacy data in MRID 47457301.

2-methyl-1-butanol
431602

DP Number: 395119
EPA Reg. No.: 84565-G

RECOMMENDATIONS AND CONCLUSIONS

1a. CSE dated 06/14/2008 is **ACCEPTABLE**; no additional data are required.

- 1b. Product chemistry data in MRIDs 474570-01 to -05 are **ACCEPTABLE**; no additional data are required.
2. Tier 1 Toxicity data are **ACCEPTABLE**, except for **acute inhalation toxicity (OPPTS 870.1300)**. In the end-use products, the TGAi is contained in a trap from which it volatilizes. Calculations must be provided to adequately address the potential 2-methyl-1-butanol concentration in the air over one acre when traps are deployed at the maximum use rate (0.7 oz/acre/week).
3. Tier 1 Non-Target data are **ACCEPTABLE**. Non-target exposure to the active ingredient within the trap is not expected when the product is used according to label instructions. Consequently, non-target organism and environmental fate data requirement waivers for this TGAi are acceptable.

Endangered Species Assessment for 2-methyl-1-butanol:

Based on the available data, a No Effects (NE) determination is made for 2-methyl-1-butanol on threatened and endangered species when the product is used according to label use directions. Specifically, in MRID 47457301, efficacy testing showed no honeybees or other non-target insect species were attracted or caught by the 2-methyl-1-butanol product. Since the active ingredient is contained in a trap, there is no exposure to birds, fish, aquatic invertebrates, or other non-targets.

4. Product Performance data are **ACCEPTABLE**. The study addresses efficacy of invertebrate control agents (OPPTS 810.3000). Based on field trials, 2-methyl-1-butanol, alongside calcium acetate is more effective than control traps on capturing various yellowjacket, wasp, and hornet species. No honeybees or other beneficial insects were attracted to the traps.

Note to RAL:

1. This review is in conjunction with 84565-G and -T. Successful registration of those end-use products is dependent on resolution of deficiencies with the 1-methyl-2-butanol TGAi.

2-methyl-1-butanol
431602

DP Number: 395119
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STUDY SUMMARIES

Description of the TGAI

Bull Run Scientific, VBT has submitted a new technical grade active ingredient, 2-methyl-1-butanol, aimed for use in a trap as an attractant for wasps, hornets, and yellowjackets. The TGAI is an alcohol that naturally occurs in a variety of fruits, beer, and wine.¹

Product Chemistry

A CSF dated 06/14/2008 was submitted. The product chemistry and physical/chemical properties data were also submitted.

Table 1 lists the nominal concentration and certified limits for the active ingredient in 2-methyl-1-butanol TGAI. The certified limits for the active ingredient and associated inert ingredients are within the OPPTS 830.1750-specified ranges.

TABLE 1. Nominal CSF concentrations and certified limits for 2-Methyl-1-butanol TGAI ^a					
Ingredients (CAS number)	PC Code	Purpose	Concentration (% by weight)		
			Nominal	Lower	Upper
Active Ingredient					
2-Methyl-1-butanol [REDACTED] (137-32-6)	431602	Active ingredient	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]					

^aData from CSF

Physical and Chemical Characteristics

The 2-methyl-1-butanol TGAI is [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]. No impurities of concern are anticipated. The analysis of the five-batch using the enforcement analytical method supports the nominal purity listed on the CSF. The Series 830 physical and chemical properties are given in Table 2.

Manufacturing process information may be entitled to confidential treatment

2-methyl-1-butanol
431602

DP Number: 395119
EPA Reg. No.: 84565-G

Table 2. Physical/Chemical Properties for 2-methyl-1-butanol

Guideline Reference No./Property		Description of Result
830.6302	Color	Colorless
830.6303	Physical State	Liquid
830.6304	Odor	Wine, onion (at 100%)
830.6313	Stability	Thermally stable at typical use temperatures. Exposure to elevated temperatures can cause decomposition.
830.6314	Oxidation/Reduction: Chemical Incompatibility	Avoid contact with strong acids and oxidizers.
830.6315	Flammability	Flash point = 50°C (open cup) Flash point = 43° (closed cup)
830.6316	Explosibility	Not required for TGA1
830.6317	Storage Stability	Not required for TGA1
830.6319	Miscibility	Not required for TGA1
830.6320	Corrosion Characteristics	Not required for TGA1
830.6321	Dielectric Breakdown Voltage	Not required for TGA1
830.7000	pH	5.8 ± 0.3 at 21°C ^b (1.0% w/v aqueous solution)
830.7100	Viscosity	Not required for TGA1
830.7200	Melting Range	Not applicable, ingredient is a liquid
830.7220	Boiling Range	128.7°C at 760 mm Hg
830.7300	Density/Relative Density/Bulk Density	0.815 g/cm ³
830.7370	Dissociation Constant in Water	Waiver requested. Based on its structure, 2-methyl-1-butanol does not contain any readily ionizable protons, and no significant dissociation of protons in water is expected. ^c
830.7550	Partition Coefficient	Log Kow = 1.29
830.7840	Water Solubility	3.22 x 10 ⁴ mg/L at 25°C
830.7950	Vapor Pressure	3 mm Hg at 20°C 4.54 mm Hg at 25°C

Conclusions: ACCEPTABLE. No additional data are required.

Tier I Acute Toxicity

Rationale in lieu of data studies were submitted for the following requirements for 2-methyl-1-butanol. Acute Oral Toxicity (OPPTS 870.1100), Acute Dermal Toxicity (OPPTS 870.1200), Acute Inhalation Toxicity (OPPTS 870.1300), Acute Eye Irritation (OPPTS 870.2400), Acute Dermal Irritation (OPPTS 870.2500), Dermal Sensitization (OPPTS 870.2600), Prenatal

2-methyl-1-butanol
431602

DP Number: 395119
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Development Toxicity (OPPTS 885.3700), Bacterial Reverse Mutation Test (OPPTS 870.5100), and *In vitro* Mammalian Cell Gene Mutation Assay (OPPTS 870.5300).

The registrant reasons that 2-methyl-1-butanol occurs naturally in a variety of fruits, beer, and wine. The two end-use products that this TGA are intended for are traps from which the TGA volatilizes. The rate of volatilization is slow enough that the attractant is effective for two to three weeks after the trap is assembled or activated. The proposed max use rate is 0.7 oz/acre/week. However, insufficient information was provided to support the waiver for acute inhalation toxicity. Calculations should be provided to address the potential 2-methyl-1-butanol concentration in the air over one acre when traps are deployed at the maximum use rate (0.7 oz/acre/week). Toxicology data from the registrant was given as follows:

Table 3. Toxicity Data Requirements Summary

<u>Study Type/OPPTS Guideline</u>	<u>LD₅₀/LC₅₀/Results</u>	<u>Reference</u>	<u>MRID</u>
Acute Oral Toxicity/OPPTS 870.1100	4.92 mL/kg in rats	HSDB	47457007
Acute Dermal Toxicity/OPPTS 870.1200	2.58 g/kg in rabbits	HSDB	47457007
Acute Inhalation Toxicity/OPPTS 870.1300	Waiver Requested		47457007
Acute Eye Irritation/OPPTS 870.2400	Severely Irritating	HSDB	47457007
Acute Dermal Irritation/OPPTS 870.2500	Minimally Irritating	HSDB	47457007
Skin Sensitization/OPPTS 870.2600	Waiver Requested		47457007
Prenatal Developmental Toxicity/OPPTS 870.3700	Waiver Requested		47457007
Bacterial Reverse Mutation Test/OPPTS 870.5100	Waiver Requested		47457007
<i>In vitro</i> Mammalian Cell Assay	4.6 mM dose was negative in Chinese hamster V-79 Assay	CCRI ²	

Conclusions: ACCEPTABLE, except for acute inhalation toxicity (OPPTS 870.1300)

Non-Targets

Rationale in lieu of data studies were submitted for the following data requirements: Aquatic Invertebrate Acute Toxicity (OPPTS 850.1010), Fish Acute Toxicity, Freshwater (OPPTS 850.1075), Avian Acute Oral Toxicity (OPPTS 850.2100), Avian Dietary Toxicity (OPPTS 850.2200), Seeding Emergence (OPPTS 850.4100), Vegetative Vigor (OPPTS 850.4150), and Non-target Insect Testing (OPPTS 850.4350). The submitted waiver requests for Tier 1 Non-Target Organisms Studies are **ACCEPTABLE**. Non-target exposure to the active ingredient within the trap is not expected when the product is used according to label instructions.

2-methyl-1-butanol
431602

DP Number: 395119
EPA Reg. No.: 84565-G

The registrant reasons that during efficacy trials (see MRID 47457301), no evidence was found of any non-target organisms, including honeybees or other beneficial insects. Consequently, non-target organism and environmental fate data requirement waivers for this TGAI are acceptable.

Conclusions: ACCEPTABLE. No additional data are required.

Product Performance

MRID 47453701 addresses efficacy of invertebrate control agents (OPPTS 810.3000). Based on field trials, 2-methyl-1-butanol is more effective than control traps on capturing various yellowjacket species. Field trials of 17 to 64 days duration were conducted in Washington and Pennsylvania to compare the efficacy of reusable and disposable yellowjacket traps containing calcium acetate (19.8% w/w) plus 2-methyl-1-butanol (5.1% w/w) or acetic acid (8.0% w/w) plus 2-methyl-1-butanol (59.75% w/w) to that of control traps containing sucrose solution or water. Approximately every two weeks, the reusable traps were emptied and re-baited, and the disposable traps were collected and replaced with new disposable traps. Although no statistical analysis was provided, the traps containing 2-methyl-1-butanol appeared to be more effective than the control traps in attracting a variety of yellowjacket species. No honeybees or other beneficial insects were attracted to the traps. The studies are acceptable.

Conclusions: ACCEPTABLE. The studies are acceptable for satisfying the data requirement (OPPTS 810.3000).

REFERENCES

1. Hazardous Substances Data Bank (HSDB). 2002. <http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB>.
2. Chemical Carcinogens Research Information System (CCRIS). 2002. <http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?CCRIS>

cc: J. Moore, R. Jones, D. Benmhend BPPD Science Review File, IHAD/ARS
J. Moore, FT, PY-S: 04/16/09

2-methyl-1-butanol
431602

DP Number: 395119
EPA Reg. No.: 84565-G

DATA EVALUATION RECORD

2-METHYL-1-BUTANOL (Disposable Bull Run Yellowjacket Trap E) (Wasp Hornet Yellowjacket Attractant System Attractant Vial)

STUDY TYPE: Waiver Requests

Acute Oral Toxicity (OPPTS 870.1100)
Acute Dermal Toxicity (OPPTS 870.1200)
Acute Inhalation Toxicity (OPPTS 870.1300)
Acute Eye Irritation (OPPTS 870.2400)
Acute Dermal Irritation (OPPTS 870.2500)
Dermal Sensitization (OPPTS 870.2600)
Prenatal Developmental Toxicity (OPPTS 870.3700)
Bacterial Reverse Mutation Test (OPPGS 870.5100)
In vitro Mammalian Cell Gene Mutation Assay (OPPTS 870.5300)

MRID 47457007

Prepared for
Biopesticides and Pollution Prevention Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Prepared by
Toxicology and Hazard Assessment Group
Environmental Sciences Division
Oak Ridge National Laboratory
Oak Ridge, TN 37830
Task Order No. 08-042A

Primary Reviewer:
Eric B. Lewis, M.S.

Signature: _____
Date: _____

Secondary Reviewers:
Sylvia Milancz, Ph.D., D.A.B.T.

Signature: _____
Date: _____

Robert H. Ross, M.S., Group Leader

Signature: _____
Date: _____

Quality Assurance:
Lec Ann Wilson, M.A.

Signature: _____
Date: _____

Disclaimer

This review may have been altered subsequent to the contractor's signatures above.

2-methyl-1-butanol
431602

DP Number: 395119
EPA Reg. No.: 84565-G

Oak Ridge National Laboratory managed and operated by UT-Battelle, LLC., for the U.S. Department of Energy under Contract No. DE-AC05-00OR22725.

DATA EVALUATION RECORD

EPA Secondary Reviewer:

STUDY TYPE:	Waiver Requests Acute Oral Toxicity (OPPTS 870.1100) Acute Dermal Toxicity (OPPTS 870.1200) Acute Inhalation Toxicity (OPPTS 870.1300) Acute Eye Irritation (OPPTS 870.2400) Acute Dermal Irritation (OPPTS 870.2500) Dermal Sensitization (OPPTS 870.2600) Prenatal Developmental Toxicity (OPPTS 870.3700) Bacterial Reverse Mutation Test (OPPGS 870.5100) <i>In vitro</i> Mammalian Cell Assay (OPPTS 870.5300)
MRID NO:	47457007
DECISION NO:	395156, 395119
DP BARCODE:	DP 356337, DP356339
TEST MATERIAL:	2-Methyl-1-butanol [Disposable Bull Run Yellowjacket Trap E (a.i., 5.1% w/w 2-methyl-1-butanol, 19.8% w/w calcium acetate); Wasp Hornet Yellowjacket Attractant System Attractant Vial (a.i., 59.75% 2-methyl-1-butanol)]
PROJECT STUDY NO:	Not applicable
SPONSOR:	Bull Run Scientific, VBT, 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519
TESTING FACILITY:	Not applicable
TITLE OF REPORT:	2-Methyl-1-Butanol: Acute Toxicity, Prenatal Developmental Toxicity, and Mutagenicity
AUTHOR:	Smith, C.A.
STUDY COMPLETED:	June 13, 2008
CONFIDENTIALITY	
CLAIMS:	None
GOOD LABORATORY PRACTICE:	A signed and dated GLP statement was included. The submitter neither sponsored nor conducted the referenced studies, and does not know if they were conducted in accordance with 40 CFR Part 160.
CONCLUSION:	The information provided is sufficient to support the requested waivers of Acute Oral Toxicity, Acute Dermal Toxicity, Acute Eye Irritation, Acute Dermal Irritation, Dermal Sensitization, Prenatal Developmental Toxicity, Bacterial Reverse Mutation Test, and <i>In vitro</i> Mammalian Cell Assay for 2-methyl-1-butanol. Insufficient information was provided to support the requested waiver for acute inhalation toxicity. Calculations should be provided to address the potential 2-methyl-1-butanol concentration in the air over one acre when traps are deployed at the maximum use rate.
SECONDARY REVIEWER	In the end-use products, the TGAI is contained in a trap from which it volatilizes. Calculations must be provided to adequately

2-methyl-1-butanol
431602

DP Number: 395119
EPA Reg. No.: 84565-G

COMMETNS: address the potential 2-methyl-1-butanol concentration in the air over one acre when traps are deployed at the maximum use rate. Therefore, the waiver rationale for Acute Inhalation is unacceptable.

Test Material

2-Methyl-1-butanol

Product Description

2-Methyl-1-butanol is an active ingredient in Disposable Bull Run Yellowjacket Trap E (a.i., 5.1% w/w 2-methyl-1-butanol, 19.8% w/w calcium acetate) and Wasp Hornet Yellowjacket Attractant System Attractant Vial (a.i., 59.75% 2-methyl-1-butanol).

Waiver Request

The registrant is requesting waivers for the following requirements for 2-methyl-1-butanol:

Acute Oral Toxicity	(OPPTS 870.1100)
Acute Dermal Toxicity	(OPPTS 870.1200)
Acute Inhalation Toxicity	(OPPTS 870.1300)
Acute Eye Irritation	(OPPTS 870.2400)
Acute Dermal Irritation	(OPPTS 870.2500)
Dermal Sensitization	(OPPTS 870.2600)
Prenatal Developmental Toxicity	(OPPTS 885.3700)
Bacterial Reverse Mutation Test	(OPPTS 870.5100)
<i>In vitro</i> Mammalian Cell Gene Mutation Assay	(OPPTS 870.5300)

Registrant's Justification

2-Methyl-1-butanol occurs naturally in bleu cheese aroma, concord grape juice essence, nectarines, apples, roasted filbert nuts, papaya fruit, oranges, tomatoes, beer, and wine.

In both end use products (Disposable Bull Run Yellowjacket Trap E and Wasp Hornet Yellowjacket Attractant System Attractant Vial), 2-methyl-1-butanol is contained in a trap, from which it volatilizes. The rate of volatilization is slow enough that the attractant is effective for two to three weeks after the trap is assembled or activated. The proposed maximum 2-methyl-1-butanol use rate is 0.7 oz/acre/week:

Brand Name	EP net weight per trap (oz)	2-Methyl-1-butanol concentration (%w/w)	Maximum trap use rate (traps/acre)	EP replacement interval (weeks)	Maximum 2-methyl-1-butanol use rate (oz/acre/week)

2-methyl-1-butanol
431602

DP Number: 395119
EPA Reg. No.: 84565-G

Disposable Bull Run Yellowjacket Trap E	10.0	5.1 ^a	48 ^b	3	0.25
Wasp Hornet Yellowjacket Attractant System Attractant Vial	0.05	59.75 ^c	48 ^b	2	0.7

^aGiven incorrectly as 1.5% in MRID 47457007

^bTypical use rate is 8 – 16 traps/acre

^cGiven incorrectly as 59.48% in MRID 47457007

Data from p. 7, MRID 47457007

The actual human exposure rate will be less, since the typical use rate is less than 48 traps/acre, and the 2-methyl-1-butanol will be dispersed by the wind.

Toxicology data for 2-methyl-1-butanol are summarized below:

Guideline	End point/result	Reference
Acute oral toxicity (870.1100)	LD ₅₀ = 4.92 mL/kg in rats	HSDB
Acute dermal toxicity (870.1200)	LD ₅₀ = 2.89 g/kg in rabbits	HSDB
Acute inhalation toxicity (870.1300)	Waiver requested	
Primary eye irritation (870.2400)	Severely irritating. Score of 8, with 10 being the maximum	HSDB
Primary dermal irritation (870.2500)	Minimally irritating	HSDB
Dermal sensitization (870.2600)	Waiver requested	
Prenatal developmental toxicity (870.3700)	Waiver requested	
Bacterial reverse mutation test (870.5100)	Waiver requested	
<i>In vitro</i> mammalian cell assay (870.5300)	4.6 millimolar dose was negative in Chinese hamster V-79 assay.	CCRIS

HSDB = Hazardous Substances Data Bank <http://toxnet.nlm.nih.gov/cgi-bin/sis/search>

CCRIS = Chemical Carcinogenesis Research Information System <http://toxnet.nlm.nih.gov/cgi-bin/sis/search>

Data from p. 8, MRID 47457007

The negative mutagenicity data for the Chinese hamster V-79 assay suggest that an Ames test would also yield negative results.

The proposed uses are non-food uses. No significant human exposure to 2-methyl-1-butanol is anticipated from the proposed use and disposal of Disposable Bull Run Yellowjacket Trap E and Wasp Hornet Yellowjacket Attractant System Attractant Vial.

Reviewer's Comments

The reviewer believes that information provided is sufficient to support the requested waivers for Acute Oral Toxicity, Acute Dermal Toxicity, Acute Eye Irritation, Acute Dermal Irritation, Dermal Sensitization, Prenatal Developmental Toxicity, Bacterial Reverse Mutation Test, and *In vitro* Mammalian Cell Gene Mutation Assay. Insufficient information was provided to support the waiver for acute inhalation toxicity. Calculations should be provided to address the potential



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: April 16, 2009

SUBJECT: Science Review in Support of the Registration of Wasp Hornet Yellowjacket Attractant System, Containing 59.75% w/w 2-Methyl-1-Butanol (Vial), 99.8% Heptyl Butyrate (Tube), and 8.0% Acetic Acid (Bottle) As Its Active Ingredients.

Decision Number:	395119
DP Number:	357196
EPA File Symbol Number:	84565-G
Chemical Class:	Biochemical
PC Codes:	431602, unassigned (HB), 044001
CAS Numbers:	137-32-6, 5870-93-9, 64-19-7
Active Ingredient Tolerance Exemptions:	Non-Food Use Product
MRID Numbers:	474571-01 to -03, 474572-01 to -03, 474573-04 to -07, 47451914, 474570-06 to -07, 47457301, 47451901, 47451914

FROM: Jacob Moore, Chemist /s/ 04/16/09 *J. Moore*
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THROUGH: Russell S. Jones, Ph.D. Senior Biologist /s/ 04/16/09 *R. S. Jones*
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P) 07/17/2009

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION

2-Methyl-1-Butanol, Heptyl Butyrate, Acetic Acid
PC Code: 431602, unassigned (HB), 044001

DP Number: 357196
EPA Reg. No.: 395119.

ACTION REQUESTED

Bull Run Scientific, VBT requests registration of Wasp Hornet Yellowjacket Attractant System, which is an end-use product trap intended for use as a wasp, hornet, and yellowjacket attractant. In support of this registration, the registrant has submitted product chemistry data in MRIDs 474571-01 to -03, 474572-01 to -02, and 474573-04 to -06, Acetic Acid Tier I Toxicity rationale in MRIDs 47457203 and 47457307, Acetic Acid Non-Target Toxicity rationale in MRID 47457306, and product performance data in MRIDs 47457301 and 47451901.

RECOMMENDATIONS AND CONCLUSIONS

1. The CSF for Wasp Hornet Yellowjacket Attractant System Vial is **UNACCEPTABLE**, but upgradable upon resolution of the following:
 - a. The purity of 2-methyl-1-butanol TGA1 is corrected in Parts 2 and 3 of the CSF. Parts 2 and 3 list the purity as [REDACTED], which should be [REDACTED].
 - b. The purity and certified limits of 2-methyl-1-butanol must be in the same row as the % by weight of 2-methyl-1-butanol.
 - c. The nominal percent by weight of 2-methyl-1-butanol must read "59.72" or "59.7" instead of "59.75". If not, a rationale must be provided for the presented nominal concentration.
 - d. The nominal certified limits for 2-methyl-1-butanol must read "61.51" or "61.5" and "57.93" or "57.9" instead of "61.54" and "57.96". If not, a rationale must be provided for the presented nominal certified limits.
2. The CSF for Yellowjacket Attractant is **UNACCEPTABLE**, but upgradable upon resolution of the following:
 - a. The "label claim" information must be in the same row as the active ingredient information.
3. The CSF for Wasp Hornet Yellowjacket Attractant System Bottle dated 06/14/08 is **UNACCEPTABLE**, but upgradable upon resolution of the following:
 - a. The "label claim" information must be in the same row as the active ingredient information.
[REDACTED]
 - c. The nominal concentration of acetic acid must read "7.96" instead of "8.00".
 - d. The certified limits for acetic acid must read "8.36" and "7.56" instead of "8.40" and "7.60".
4. The Attractant Vial and Attractant System trap must be adequately described. More information must be provided on the bottom chamber and the overall shape of the System trap. The only information provided on the Attractant Vial is that it is a "snap-cap". More information about the size and shape of the Attractant Vial must be provided.

Inert ingredient information may be entitled to confidential treatment
Manufacturing process information may be entitled to confidential treatment

5. Tier 1 Toxicity data are **UNACCEPTABLE**, pending resolution of the following:
 - a. Acetic acid, in the EP, is used at a concentration of 8%. The registrant cites data for a 97% solution of acetic acid, which would warrant Toxicity Category I or II language on the label, due to eye irritation. Even though the EP is contained in a trap, some dermal and eye exposure can occur due to the refill kits. The registrant must provide rationale on why Toxicity Category III or IV language is being used on the label or submit data in support of Toxicity Category III or IV label language.
6. Tier 1 Non-Target data are **ACCEPTABLE**. Non-target exposure to the active ingredient within the trap is not expected when the product is used according to label instructions. Consequently, non-target organism and environmental fate data requirement waivers for Acetic Acid are acceptable.
7. Product Performance data are **ACCEPTABLE**. The study addresses efficacy of invertebrate control agents (OPPTS 810.3000). Based on field trials, 2-methyl-1-butanol, alongside calcium acetate and heptyl butyrate, is more effective than control traps on capturing various yellowjacket, wasp, and hornet species. No honeybees or other beneficial insects were attracted to the traps.

Note to RAL:

1. Registration of this product is dependent on resolution of deficiencies found in the science memos for heptyl butyrate (84565-U) and 2-methyl-1-butanol TGAI.

STUDY SUMMARIES

Description of the Product

Wasp Hornet Yellowjacket Attractant System is an EP intended for use as a paper wasp, hornet, and yellowjacket attractant. The product consists of a trap that contains three components: Yellowjacket Attractant, Wasp Hornet Yellowjacket Attractant System Vial, and Wasp Hornet Yellowjacket Attractant System Bottle. The three components of the trap are also sold separately under the brand name AAA Wasp Hornet Yellowjacket Attractant Kit.

Product Chemistry

Yellowjacket Attractant consists of 99.8% heptyl butyrate, which is also being registered concurrently as a separate TGAI/EP (84565-U). Wasp Hornet Yellowjacket Attractant Vial is 59.7% w/w 2-methyl-1-butanol and [REDACTED]. Wasp Hornet Yellowjacket Attractant Bottle is 8.0% w/w acetic acid with [REDACTED]. The production process was adequately described, except for the description of the vial and system trap. Those two descriptions must be provided. The purity of 2-methyl-1-butanol in Parts 2 and 3 of the CSF for the vial must be clarified. The purity is currently given as [REDACTED] instead of [REDACTED]. The lower and upper certified limits for [REDACTED] must be corrected (See point 3b. above). The physical/chemical characteristics were adequately addressed and are summarized below:

Inert ingredient information may be entitled to confidential treatment
Manufacturing process information may be entitled to confidential treatment

Transaction Detail Results

06/16/2008
10:47 AM ET

Agency: EPAOPPTS Application: PRIA Service Fees

Transaction Information

Pay.gov Tracking ID: 24UP6JK4
Agency Tracking ID: 74047508101
Account Holder Name: Bull Run LLC
Transaction Date (ET): 6/11/2008 10:58 PM
Effective Date: 6/13/2008
Transaction Amount: \$7,500.00
Payment: 1 of 1
Collection Status: Settled
ACH Type: Debit
Deposit Ticket: 000358
Debit Voucher:
Return Description:

Custom Collection Fields

Registration Number Ref YJ-3



United States
Environmental Protection Agency
Washington DC 20460



Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 84565- G	2. EPA Product Manager	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Wasp Hornet Yellowjacket Attractant System	PM#	
5. Name and Address of Applicant (Include ZIP Code) Bull Run Scientific, VBT 7400-Beaufont Springs Drive, Suite-300 Richmond, VA 23225-5519 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Application for registration of a new product containing 3 separately packaged pesticide products:

1. Attractant Bottle (containing acetic acid from an unregistered source);
2. Attractant Vial (containing 2-methyl-1-butanol, a new active ingredient); and
3. Yellowjacket Attractant (containing heptyl butyrate, a new active ingredient).

Proposed for joint review with CDPR. See attached page for Section III information.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container See page 2.		5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Cynthia Ann Smith		Title Agent for Bull Run Scientific, VBT		Telephone No. (Include Area Code) 703-339-1117	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature <i>Cynthia Ann Smith</i>		3. Title Agent for Bull Run Scientific, VBT			
4. Printed Name Cynthia Ann Smith		5. Date June 16, 2008			

June 16, 2008
HAND DELIVERED

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
277 South Crystal Drive
Arlington, VA 22202-4501
Attn: Ms. Linda Hollis

Dear Ms. Hollis:

RE: Wasp Hornet Yellowjacket Attractant System
(Containing Acetic Acid, Heptyl Butyrate, 2-Methyl-1-butanol)
End-Use Product Containing New Active Ingredients
Application for Registration
Proposed Joint Review with CDPR

This letter and the associated documentation is submitted on behalf of Bull Run Scientific, VBT (EPA Company Number 84565).

Enclosed is an Application for EPA Registration of the Wasp Hornet Yellowjacket Attractant System containing acetic acid, heptyl butyrate, 2-methyl-1-butanol. Acetic acid is familiar to the Agency, but the proposed source is not an EPA registered source. Both heptyl butyrate and 2-methyl-1-butanol are new active ingredients and have been accepted by BPPD as biochemicals.

The Wasp Hornet Yellowjacket Attractant System is an ensemble of three separately packaged pesticide products, packaged in a single retail container, for use in the AAA Trap for Wasps, Hornets & Yellowjackets. Each of the three attractants:

1. Wasp Hornet Yellowjacket Attractant System Attractant Bottle,
2. Wasp Hornet Yellowjacket Attractant System Attractant Tube (a.k.a. Yellowjacket Attractant), and
3. Wasp Hornet Yellowjacket Attractant System Attractant Vial

is placed in a separate portion of the trap for outdoor non-food use.

The proposed alternate brand names for the Wasp Hornet Yellowjacket Attractant System are:

1. AAA Trap for Wasps, Hornets and Yellowjackets, and
2. AAA Wasp Hornet Yellowjacket Attractant Kit.

The AAA Trap for Wasps, Hornets and Yellowjackets is sold with the attractant included. The AAA Wasp Hornet Yellowjacket Attractant Kit is the refill attractant.

The PRIA considerations are addressed in a separate concurrently submitted letter.

The contents of the Application for Registration are listed in Attachment 1.

June 16, 2008 Letter to Ms. L. Hollis - Page 2 of 4
Wasp Hornet Yellowjacket Attractant System
(Containing Acetic Acid, Heptyl Butyrate, 2-Methyl-1-butanol)
End-Use Product Containing New Active Ingredients
Application for Registration
Proposed Joint Review with CDPR

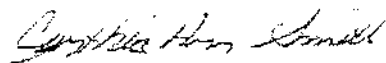
Please note that Bull Run Scientific, VBT is submitting the required data to support the registration of the active ingredients but is not requesting a registration of the active ingredients.

Bull Run Scientific, VBT proposes EPA-CDPR joint review of this application.

Bull Run Scientific, VBT plans to submit an application for registration of this product to the state of New York. Please note that the New York State Department of Environmental Conservation requires the submission of all of the EPA Data Evaluation Records (DERs) for the product. Therefore, Bull Run Scientific, VBT will also be seeking a copy of the DERs for the data accompanying this Application.

Bull Run Scientific, VBT and I look forward to working with the Agency regarding this important application. Please feel free to contact me by phone or e-mail. Also, my office is located 25 minutes from EPA's office at One Potomac Yard, and I would be pleased to pick up the Notice of Registration when it is available.

Respectfully submitted,



Cynthia Ann Smith
Vice President
Agent for Bull Run Scientific, VBT

Attachment

cc: G. Simpson, Bull Run Scientific, VBT
M. Robinson, Robinson Associates

ATTACHMENT 1
Itemized Contents of the Application of Registration of
the Wasp Hornet Yellowjacket Attractant System
(Containing Heptyl Butyrate, 2-Methyl-1-butanol, and Acetic Acid)

1. Administrative Volume (1 copy)
 - 1.1. PRIA
 - 1.1.1. Confirmation of payment of fee: Reference YJ-1 (6/11/2008)
 - 1.1.2. Confirmation of payment of fee: Reference YJ-2 (6/11/2008)
 - 1.1.3. Confirmation of payment of fee: Reference YJ-4 (6/11/2008)
 - 1.1.4. Letter summarizing the PRIA considerations
 - 1.2. Correspondence
 - 1.2.1. Authorized agent letter from Bull Run Scientific, VBT (4/4/2008)
 - 1.2.2. Biochemical classification decision for heptyl butyrate and acetic acid (04/15/2008)
 - 1.2.3. Biochemical classification decision for 2-methyl-1-butanol (08/02/2007)
 - 1.2.3. Pre-submission consultation meeting proposed minutes cover letter (1/15/2008)
 - 1.2.4. Pre-submission consultation meeting proposed minutes (1/15/2008)
 - 1.3. Forms
 - 1.3.1. Application Form (6/16/2008)
 - 1.3.2. Certification with Respect to Citation of Data (6/16/2008)
 - 1.4. Confidential Statement of Formula (2 copies each)
 - 1.4.1. Wasp Hornet Yellowjacket Attractant System Attractant Bottle (containing acetic acid) (6/14/2008)
 - 1.4.2. Yellowjacket Attractant (containing heptyl butyrate) (6/14/2008)
 - 1.4.3. Wasp Hornet Yellowjacket Attractant System Attractant Vial (containing 2-methyl-1-butanol) (6/14/2008)
 - 1.5. Label (6/16/2008) (5 copies)
 - 1.6. Data Matrix
 - 1.6.1. Acetic Acid TGA
 - 1.6.1.1. Agency Internal Use Copy (6/16/2008)
 - 1.6.1.2. Public File Copy (6/16/2008)
 - 1.6.2. Acetic Acid EP: Wasp Hornet Yellowjacket Attractant System Attractant Bottle
 - 1.6.2.1. Agency Internal Use Copy (6/16/2008)
 - 1.6.2.2. Public File Copy (6/16/2008)
 - 1.6.3. Heptyl butyrate [TGA and Yellowjacket Attractant (EP)]
 - 1.6.3.1. Agency Internal Use Copy (6/16/2008)
 - 1.6.3.2. Public File Copy (6/16/2008)
 - 1.6.4. 2-Methyl-1-butanol TGA
 - 1.6.4.1. Agency Internal Use Copy (6/16/2008)
 - 1.6.4.2. Public File Copy (6/16/2008)
 - 1.6.5. 2-Methyl-1-butanol EP: Wasp Hornet Yellowjacket Attractant System Attractant Vial
 - 1.6.5.1. Agency Internal Use Copy (6/16/2008)
 - 1.6.5.2. Public File Copy (6/16/2008)

2. Data Volumes (3 copies each)
 - 2.1. Acetic acid
 - 2.1.1. Transmittal document (6/16/2008)
 - 2.1.2. 7 TGA data volumes
 - 2.1.2. 4 Wasp Hornet Yellowjacket Attractant System Attractant Bottle (EP) data volumes
 - 2.2. Heptyl butyrate
 - 2.2.1. Transmittal document (6/16/2008)
 - 2.2.2. 14 combination TGA and EP data volumes
 - 2.3. 2-Methyl-1-butanol
 - 2.3.1. Transmittal document (6/16/2008)
 - 2.3.2. 7 TGA data volumes
 - 2.3.3. 3 Wasp Hornet Yellowjacket Attractant System Attractant Vial (EP) data volumes

April 4, 2008

Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
277 South Crystal Drive
Arlington, VA 22202-4501
Attn: Mr. Leonard Cole

Dear Mr. Cole:

RE: Letter of Authorization

Bull Run Scientific, VBT hereby authorizes Conn & Smith, Inc. to serve as its Agent for all pesticide registration matters before the U.S. Environmental Protection Agency Office of Pesticide Programs. Until further notice, please direct all communications for Bull Run Scientific, VBT to:

Conn & Smith, Inc.
6713 Catskill Road
Lorton, VA 22079-1113
Attn: Cynthia Smith

Telephone: 703-339-1117
E-mail: cindy@connsmith.com

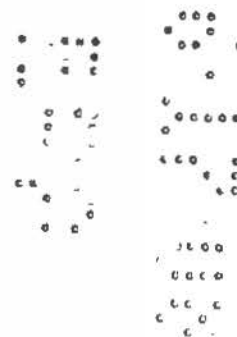
If for any reason Conn & Smith is not available, please feel free to contact me directly.

Sincerely,



Gerry Simpson
Authorized Agent for Bull Run Scientific, VBT

cc: Cynthia Smith, Conn & Smith, Inc.





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

**OFFICE OF PESTICIDES AND TOXIC
SUBSTANCES**

15 April 2008

Ms. Cynthia Ann Smith, Vice President
Conn & Smith
6713 Catskill Road
Lorton, VA 22079-1113

Dear Ms. Smith:

Thank you for your application to the Biochemical Classification Committee (BCC) for consideration of the active ingredients, Calcium Acetate, Heptyl Butyrate, Indole, and Trimethylamine, as new biochemical active ingredients. The consensus of the Biochemical Classification Committee, with the concurrence of the BPPD management, was as follows:

Calcium acetate is classified as Not a Biochemical, but Eligible for a Reduced Data Set; it is reviewable in BPPD. Since there was no available evidence demonstrating that this compound was naturally-occurring, it did not fully meet the criteria needed to classify Calcium acetate as a Biochemical. However, calcium ions and acetate ions are commonly found in living organisms.

Heptyl Butyrate and Trimethylamine are classified as Biochemical active ingredients, and are also reviewable in BPPD.

Indole was previously classified as a Biochemical active ingredient in 2001, but there are no currently registered products containing Indole as an active ingredient.

I apologize for the delay in completing this Biochemical Classification review. If you have any questions, please contact me at the address below.

Sincerely

Russell S. Jones, Ph.D., Senior Biologist /s/ 04/15/2007
Chair, Biochemical Classification Committee
Biopesticides & Pollution Prevention Division (7511P)
Office of Pesticide Programs
U. S. Environmental Protection Agency
2777 South Bell Street
One Potomac Yard, 8th Floor
Arlington, VA 22202
703/308-5071
jones.russell@epa.gov

cc: Linda Hollis, Chief, Biochemicals Branch/BPPD
Janet Andersen Ph.D., Director, BPPD



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

**OFFICE OF PESTICIDES AND TOXIC
SUBSTANCES**

Ms. Cynthia A. Smith
Vice-President
Conn & Smith, Inc.
6713 Catskill Road
Lorton, VA 22079-1113

02 August 2, 2007

CONFIDENTIAL BUSINESS INFORMATION

Dear Ms. Smith:

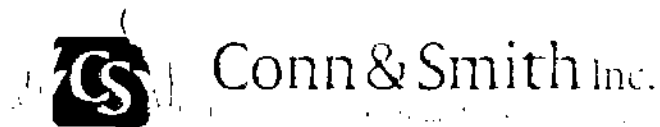
Thank you for your application to the Biochemical Classification Committee (BCC) for consideration of the active ingredients, [REDACTED] and 2-Methyl-1-Butanol as potential new biochemical active ingredients. Based on their natural occurrence and non-toxic mode of action, the BCC recommends that the aforementioned active ingredients be classified as a Biochemical Pesticides and, therefore, reviewable in the Biopesticides & Pollution Prevention Division (BPPD).

Please contact Leonard Cole, New Active Ingredients Team Captain (cole.leonard@epa.gov) at 703/308-8733 to schedule a pre-registration meeting.

Sincerely

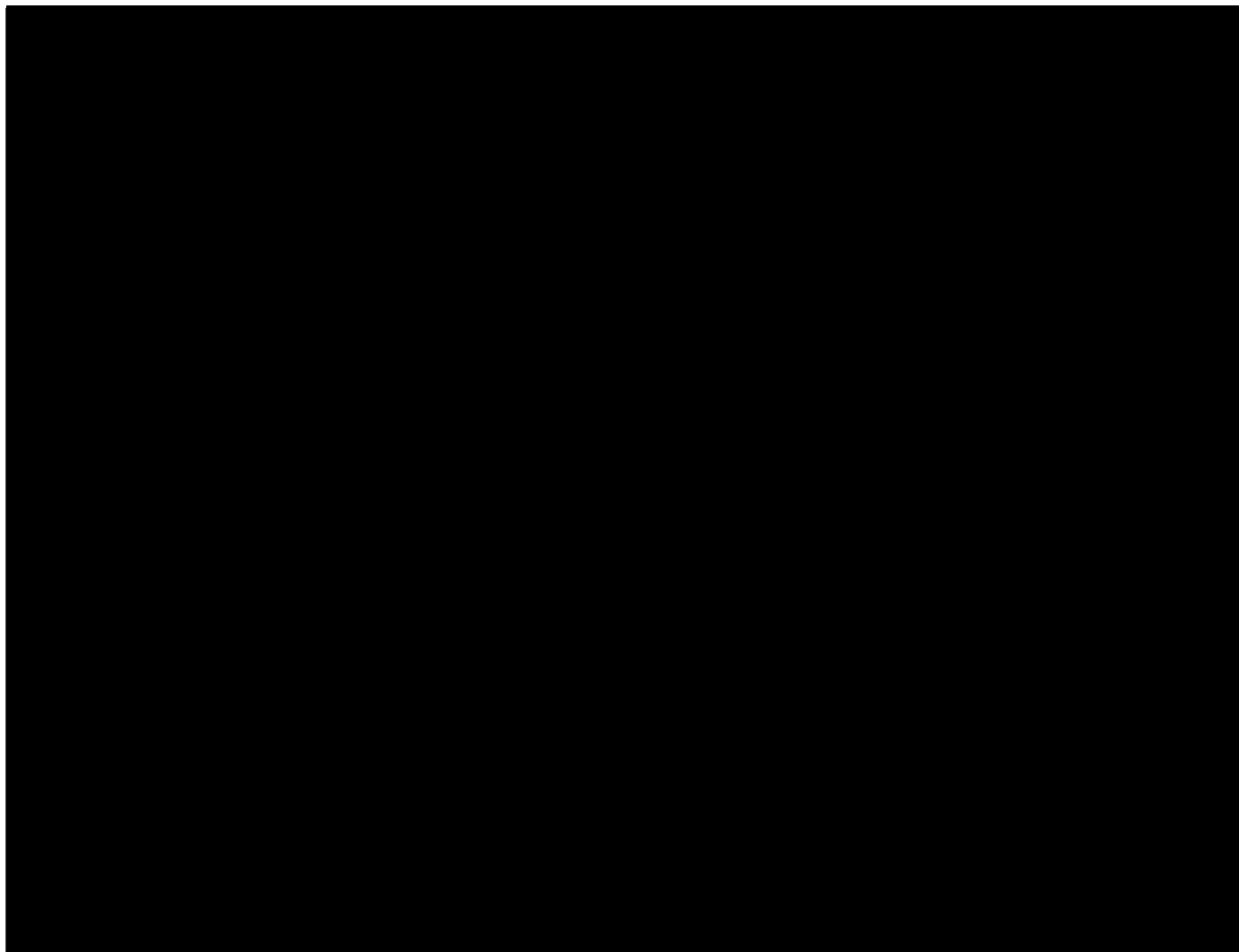
Russell S. Jones, Ph.D., Senior Biologist /s/ 08/02/2007
Chair, Biochemical Classification Committee
Biopesticides & Pollution Prevention Division (7511P)
Office of Pesticide Programs
U. S. Environmental Protection Agency
2777 South Bell Street
One Potomac Yard, 8th Floor
Arlington, VA 22202
703/308-5071
jones.russell@epa.gov

cc: Leonard Cole, New Active Ingredients Team Captain, Biochemicals Branch/BPPD
Linda Hollis, Chief, Biochemicals Branch/BPPD



January 15, 2008
FOR HAND DELIVERY

CONFIDENTIAL BUSINESS INFORMATION



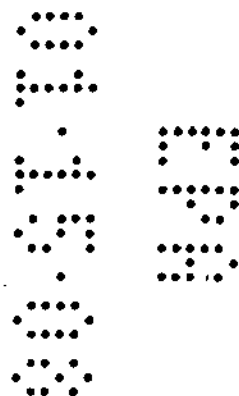
Sincerely,

A handwritten signature in cursive script that reads 'Cynthia A. Smith'.

Cynthia Smith
Vice President
Agent for Bull Run Scientific, VBT

Enclosures

cc: G. Simpson, Bull Run Scientific, VBT



January 15, 2008
FOR HAND DELIVERY

CONFIDENTIAL BUSINESS INFORMATION

Sincerely,



Cynthia Smith
Vice President
Agent for Bull Run Scientific, VBT

Enclosures

cc: G. Simpson, Bull Run Scientific, VBT

**Bull Run *Revised* Wasp-Hornet-Yellowjacket (WHY) Trap:
Proposed Minutes of the December 19, 2007 Pre-Submission Consultation Meeting
Submitted 01/15/2008 By Bull Run Scientific, VBT - Page 1 of 18**

CONFIDENTIAL BUSINESS INFORMATION
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Pages 107-124 - *Claimed confidential by submitter*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date		June 16, 2008		EPA Reg No./File Symbol		84565-		Page 1 of 6	
Applicant's/Registrant's Name & Address				Product					
Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519				Wasp Hornet Yellowjacket Attractant System: Attractant Bottle					
Ingredient				Acetic Acid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note				
			Please see the attached pages.						
Signature			Name and Title				Date		
<i>Cynthia Ann Smith</i>			Cynthia Ann Smith, Agent for Bull Run Scientific, VBT				June 16, 2008		

DATA MATRIX

Date **June 16, 2008**

EPA Reg No./File Symbol

84565-

Page **2** of **6**

Applicant's/Registrant's Name & Address

**Bull Run Scientific, VBT
7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519**

Product

**Wasp Hornet Yellowjacket Attractant System:
Attractant Bottle**

Ingredient

Acetic Acid

Guideline
Reference
Number

Guideline Study Name

Comment

Vol. No.

MRID Number

Submitter

Status

Note

DATA MATRIXDate **June 16, 2008**

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84565-Page **3** of **6**

Applicant's/Registrant's Name & Address

Bull Run Scientific, VBT**7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519**

Product

**Wasp Hornet Yellowjacket Attractant System:
Attractant Bottle**

Ingredient

Acetic Acid

DATA MATRIX

Date	June 16, 2008	EPA Reg No./File Symbol	84565-	Page	4	of	6
Applicant's/Registrant's Name & Address		Product					
Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519		Wasp Hornet Yellowjacket Attractant System: Attractant Bottle					

Ingredient							
Acetic Acid							
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note

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Date **June 16, 2008**

EPA Reg No./File Symbol **84565-**

Page **5** of **6**

Applicant's/Registrant's Name & Address

**Bull Run Scientific, VBT
7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519**

Product

**Wasp Hornet Yellowjacket Attractant System:
Attractant Bottle**

Ingredient

Acetic Acid

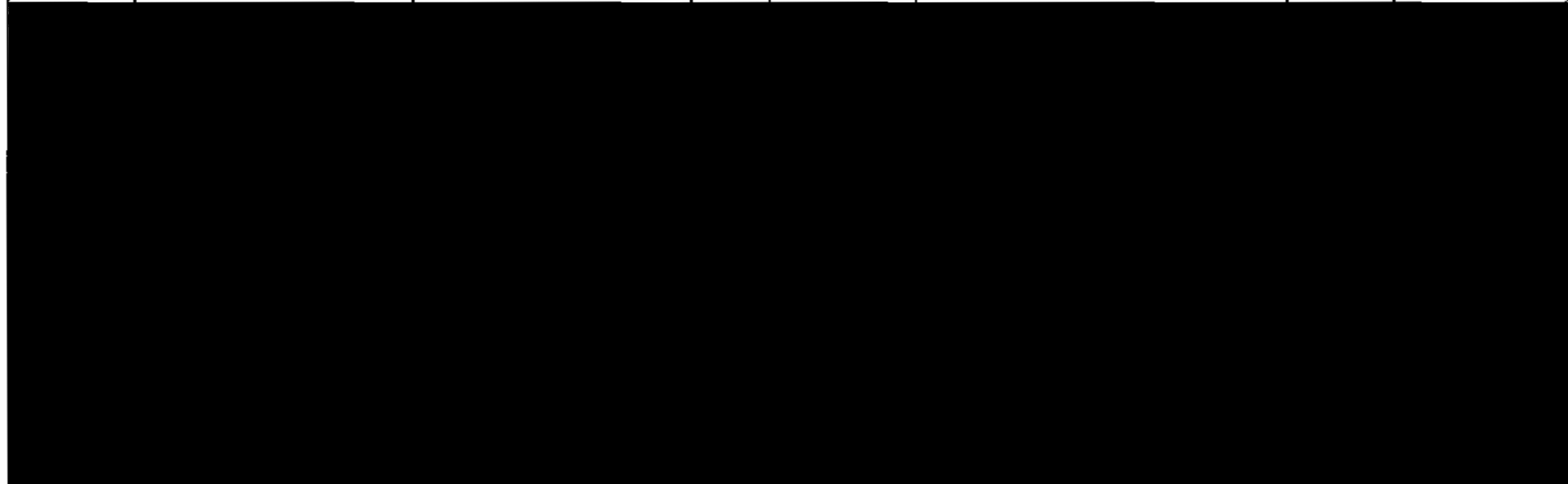
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[REDACTED]							

DATA MATRIX

Date June 16, 2008	EPA Reg No. /File Symbol 84565-	Page 6 of 6
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519	Product Wasp Hornet Yellowjacket Attractant System: Attractant Bottle	

Ingredient Acetic Acid

Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note
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DATA MATRIX							
Date June 16, 2008				EPA Reg No./File Symbol 84565-		Page 2 of 7	
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519				Product Yellowjacket Attractant (EP) and Heptyl Butyrate TGA			
Ingredient Heptyl Butyrate							
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note

DATA MATRIX

Date	June 16, 2008	EPA Reg No./File Symbol	84565-	Page	3	of	7
Applicant's/Registrant's Name & Address		Product					
Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519		Yellowjacket Attractant (EP) and Heptyl Butyrate TGA1					

Ingredient							
Heptyl Butyrate							
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note

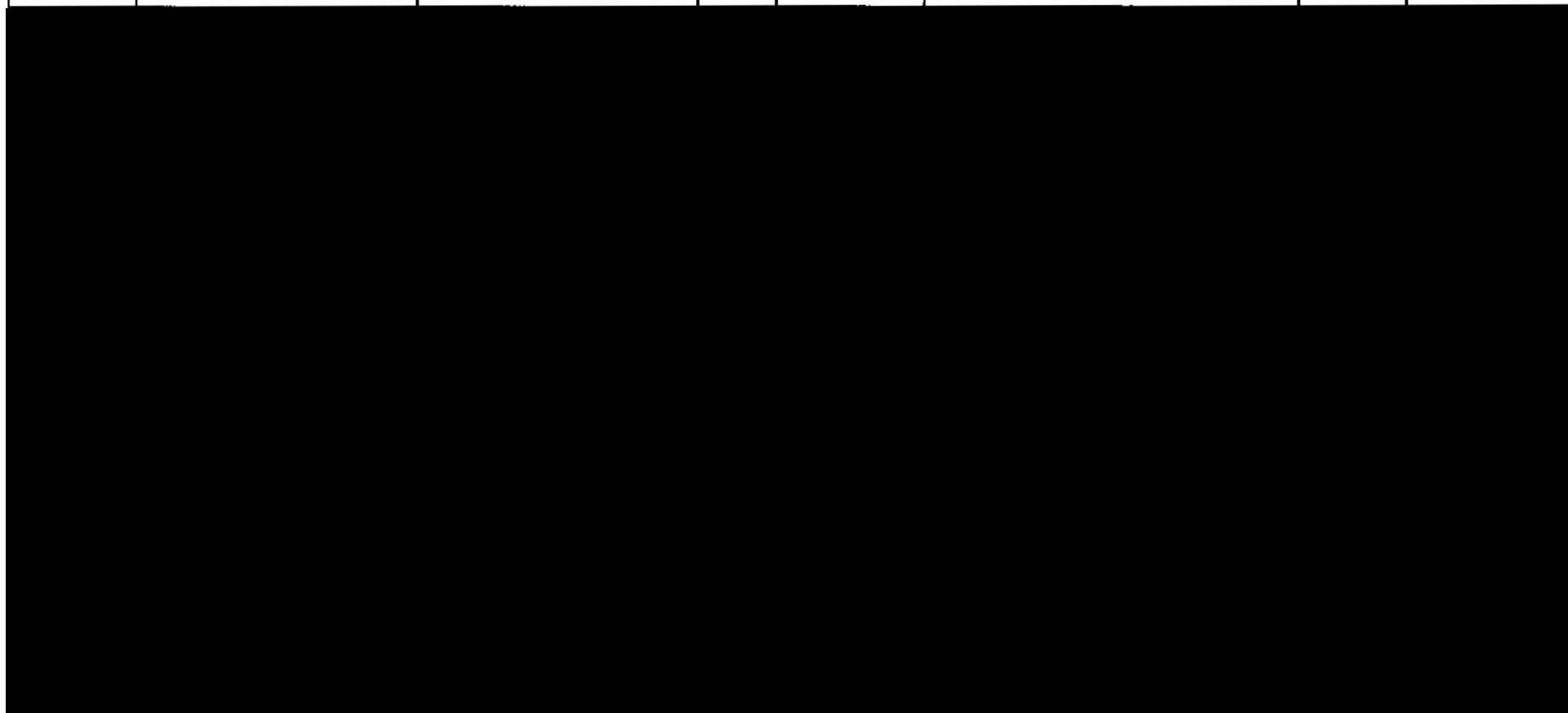
DATA MATRIX

Date	June 16, 2008	EPA Reg No./File Symbol	84565-	Page	4	of	7
Applicant's/Registrant's Name & Address		Product					
Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519		Yellowjacket Attractant (EP) and Heptyl Butyrate TGA1					

Ingredient

Heptyl Butyrate

Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note
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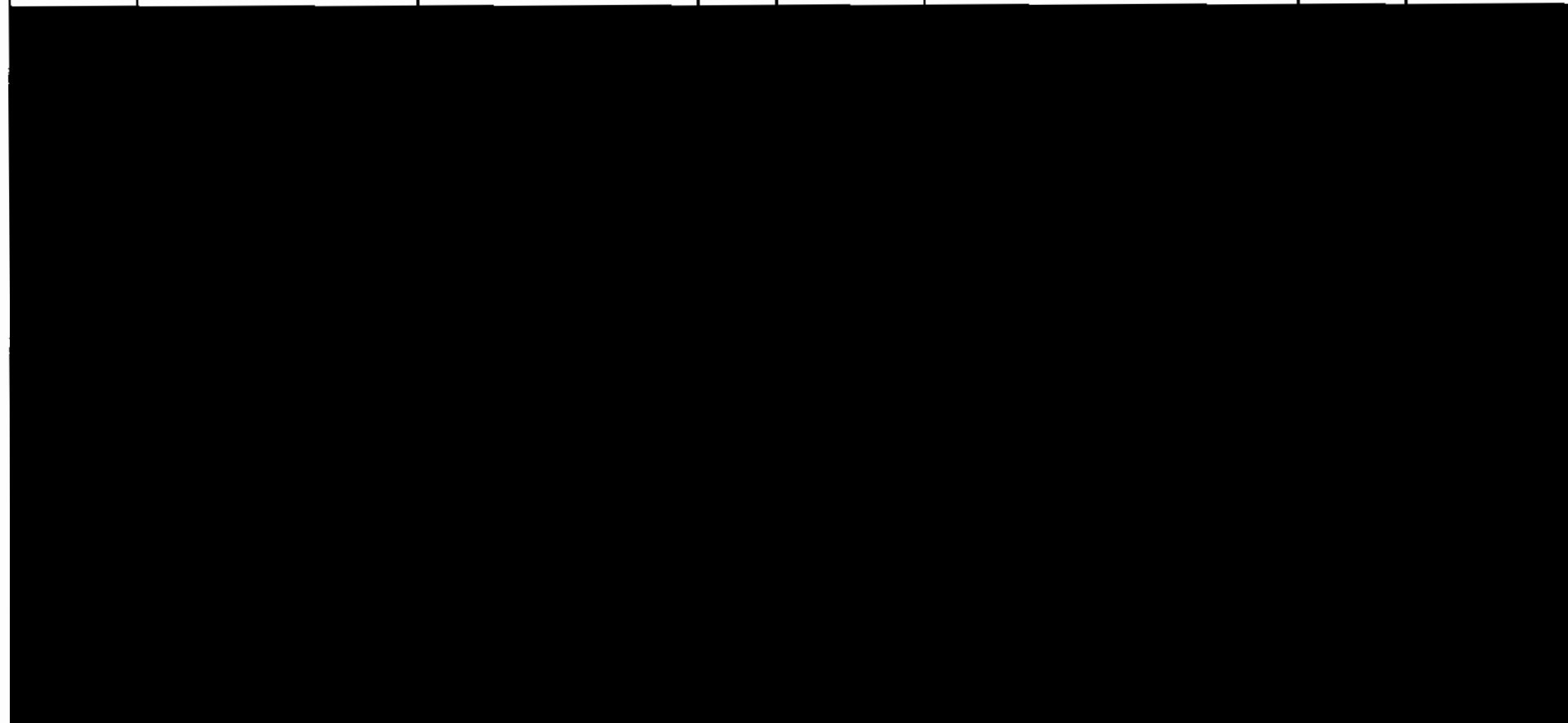


DATA MATRIX

Date	June 16, 2008	EPA Reg No./File Symbol	84565-	Page	5	of	7
Applicant's/Registrant's Name & Address		Product					
Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519		Yellowjacket Attractant (EP) and Heptyl Butyrate TGA					

Ingredient							
Heptyl Butyrate							

Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note
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Date June 16, 2008				EPA Reg No. / File Symbol 84565-		Page 6 of 7	
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Ingredient Heptyl Butyrate							
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Date June 16, 2008				EPA Reg No. /File Symbol 84565-		Page 7 of 7	
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519				Product Yellowjacket Attractant (EP) and Heptyl Butyrate TGA1			
Ingredient Heptyl Butyrate							
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note



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401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved ID No. 2070-0060

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Date		June 16, 2008		EPA Reg No./File Symbol		84565-		Page 1 of 6	
Applicant's/Registrant's Name & Address				Product					
Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519				2-Methyl-1-butanol (TGAI)					
Ingredient				2-Methyl-1-butanol					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note				
			Please see the attached pages.						
Signature			Name and Title				Date		
			Cynthia Ann Smith, Agent for Bull Run Scientific, VBT				June 16, 2008		

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Date **June 16, 2008**

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Applicant's/Registrant's Name & Address
Bull Run Scientific, VBT
7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519

Product	2-Methyl-1-butanol (TGA1)
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Ingredient	2-Methyl-1-butanol
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Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note
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Guideline Study Name	
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Comment

Vol. No.	
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MRID Number

Submitter

Status	
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Note	
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DATA MATRIX

Date **June 16, 2008**

EPA Reg No./File Symbol **84565-**

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Applicant's/Registrant's Name & Address

**Bull Run Scientific, VBT
7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519**

Product

2-Methyl-1-butanol (TGA)

Ingredient

2-Methyl-1-butanol

Guideline
Reference
Number

Guideline Study Name

Comment

Vol. No.

MRID Number

Submitter

Status

Note

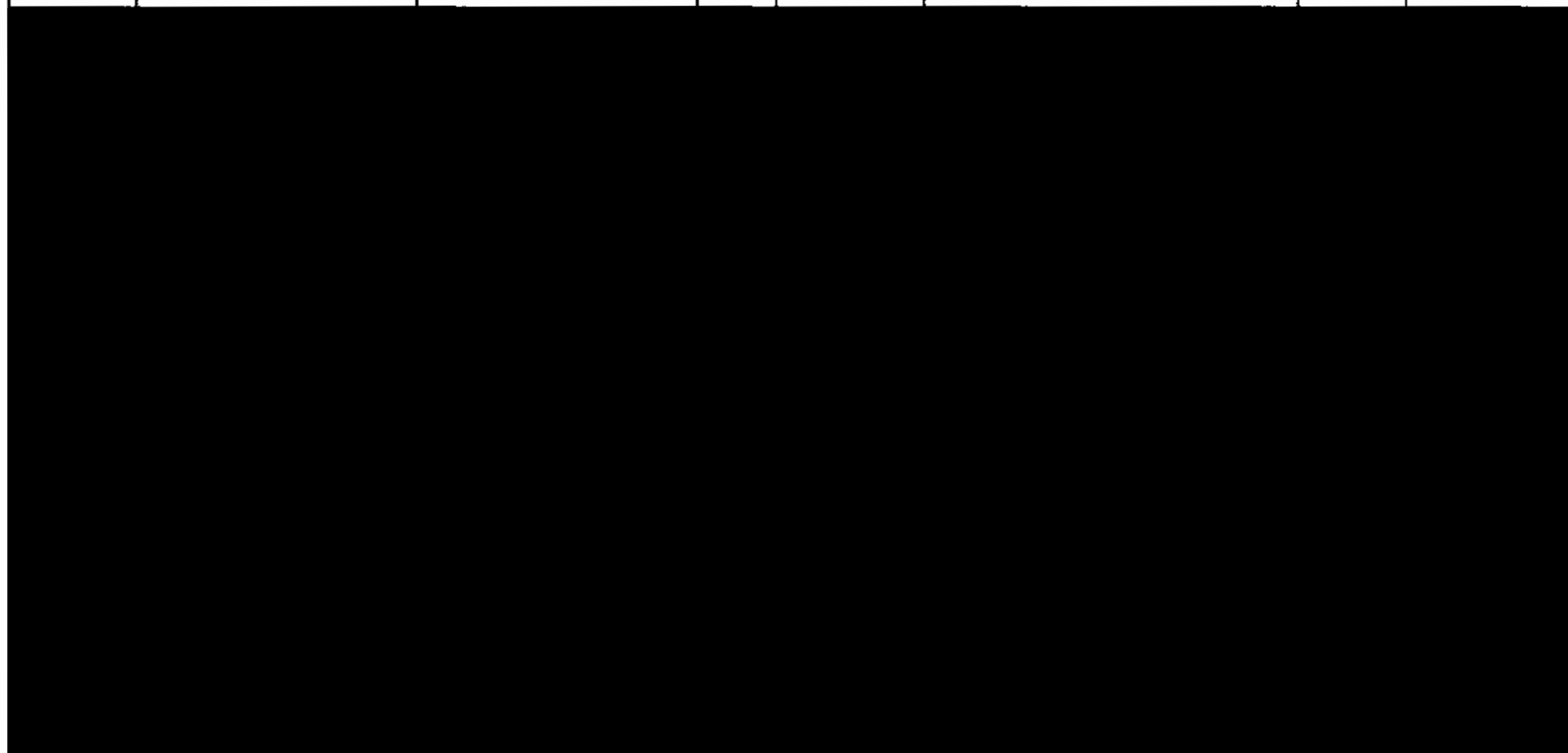
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Date	June 16, 2008	EPA Reg No./File Symbol	84565-	Page	4	of	6
Applicant's/Registrant's Name & Address		Product					
Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519		2-Methyl-1-butanol (TGA)					

Ingredient

2-Methyl-1-butanol

Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note
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Date June 16, 2008					EPA Reg No./File Symbol 84565-		Page 5 of 6	
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519					Product 2-Methyl-1-butanol (TGA)			
Ingredient 2-Methyl-1-butanol								
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note	

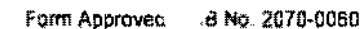
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Applicant's/Registrant's Name & Address		Product					
Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519		2-Methyl-1-butanol (TGA)					

Ingredient							
2-Methyl-1-butanol							

Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note
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Date June 16, 2008				EPA Reg No. /File Symbol 84565-		Page 2 of 6	
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519				Product Wasp Hornet Yellowjacket Attractant System: Attractant Vial			
Ingredient 2-Methyl-1-butanol							
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note
	EFFICACY						

DATA MATRIX

Date June 16, 2008				EPA Reg No./File Symbol 84565-		Page 3 of 6	
Applicant's/Registrant's Name & Address Bull Run Scientific, VBT 7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519				Product Wasp Hornet Yellowjacket Attractant System: Attractant Vial			
Ingredient 2-Methyl-1-butanol							
Guideline Reference Number	Guideline Study Name	Comment	Vol. No.	MRID Number	Submitter	Status	Note

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DATA MATRIX

Date **June 16, 2008**

EPA Reg No./File Symbol

84565-

Page **6** of **6**

Applicant's/Registrant's Name & Address

Bull Run Scientific, VBT

7400 Beaufont Springs Drive, Suite 300, Richmond, VA 23225-5519

Product

**Wasp Hornet Yellowjacket Attractant System:
Attractant Vial**

Ingredient

2-Methyl-1-butanol

Guideline
Reference
Number

Guideline Study Name

Comment

Vol. No.

MRID Number

Submitter

Status

Note

**JUNE 16, 2006 PROPOSED MASTER LABEL (excluding graphics)
for the WASP HORNET YELLOWJACKET TRAP SYSTEM (EPA File Symbol 84565-___)
and Alternate Brand Names:**

- 1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and**
- 2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT**

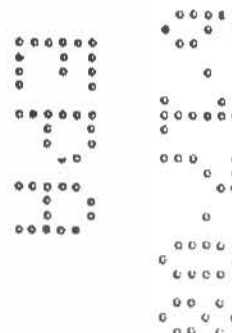
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1.1. Product Insert	2
1.2. Trap Front Panel Label	5
1.3. Trap Back Panel Label	5
1.4. Attractant Tube Container Label	8
1.5. Attractant Vial Container Label	8
1.6. Attractant Bottle Container Label	8
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT	9
2.1. Product Insert	9
2.2. Front Panel Label	9
2.3. Back Panel Label	10
2.4. Attractant Vial Container Label	11
2.5. Attractant Bottle Container Label	11
2.6. Attractant Tube Container Label	11

Notes:

- The **WASP HORNET YELLOWJACKET TRAP SYSTEM** contains three attractants, each with one active ingredient:
 - Heptyl butyrate (99.8%);
 - 2-Methyl-1-butanol (59.75%); and
 - Acetic acid (8.0%).
- The **AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS** includes the trap and the three attractants.
- The **AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT** is the attractant refill for the AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS and contains the three attractants without the trap.



**JUNE 16, 2006 PROPOSED MASTER LABEL (excluding graphics)
for the WASP HORNET YELLOWJACKET TRAP SYSTEM (EPA File Symbol 84565-___)
and Alternate Brand Names:**

- 1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and**
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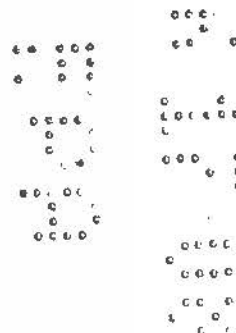
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Notes:

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1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS

1.1. Product Insert

**AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS
and
AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT**

PRODUCT INSERT (INSTRUCTIONS)

The attractants in the AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS and the AAA ATTRACTANT KIT are proven to trap the following species: Paper Wasp (*Polistes fuscatus*), European Paper Wasp (*P. dominulus*), Golden Paper Wasp (*P. aurifer*), Red Wasp (*P. perplexus*), Paper Wasp (*P. metricus*), Red Wasp (*P. carolina*), European Hornet (*Vespa crabro*), Bald-faced Hornet (*Dolichovespula maculata*), Aerial Yellowjacket (*D. arenaria*), Blackjacket (*Vespula consobrina*), California Yellowjacket (*V. sulphurea*), Common Yellowjacket (*V. vulgaris*), Eastern Yellowjacket (*V. maculifrons*), Forest Yellowjacket (*V. acadica*), German Yellowjacket (*V. germanica*), Northeastern Yellowjacket (*V. vidua*), Prairie Yellowjacket (*V. atripilosa*), Southern Yellowjacket (*V. squamosa*), Transition Yellowjacket (*V. flavopilosa*), Western Yellowjacket (*V. pensylvanica*).

CONTENTS	INGREDIENTS
1 TUBE NET WT: 0.05 oz	Active ingredient (naturally occurring) Heptyl Butyrate 99.8% Other ingredients 0.2% Total 100.0%
1 VIAL NET WT: 0.05 oz	Active ingredient (naturally occurring) 2-Methyl-1-butanol 59.75% Other ingredients 40.25% Total 100.00%
1 BOTTLE NET WT: 0.88 oz	Active ingredient (naturally occurring) Acetic Acid 8.0% Other ingredients 92.0% Total 100.0%

CAUTION

KEEP OUT OF REACH OF CHILDREN

Contents of enclosed bottle may cause eye and skin irritation.
Keep away from eyes and skin. Wash hands after handling product.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[Illustration of trap components]

INITIAL SETUP

1. Unscrew trap top cap; remove twist-tie and enclosed Attractant Vial and Attractant Bottle.
2. Unscrew trap bottom cap; remove Attractant Tube and felt pad. (Leave cone in place.)
3. Bait the bottom chamber first:
 - a. Place felt pad into attractant cup in trap bottom cap.
 - b. Cut tip of Attractant Tube.
 - c. Carefully empty attractant liquid onto felt pad.
 - d. Screw bottom cap back in place.
 - e. Set trap on flat surface.
4. Next, bait the top chamber:
 - a. Remove Attractant Vial from its plastic pouch.
 - b. Pop open lid to Attractant Vial and snap into one of three notches next to the cone in the trap top cap. (Figure 1)
 - c. Unscrew lid to Attractant Bottle and pour liquid into trap top chamber.
 - d. Add water to trap top chamber so solution reaches the Start Line.
 - e. Thread twist-tie through hole on trap top cap.
 - f. Screw top cap back on and hang outdoors. (Figure 2)



Trap Placement:

1. Hang trap away from human activity.
2. Hang at least 20 feet away from a known wasp, hornet or yellowjacket nest.
3. In extreme hot and dry weather, hang trap in the shade.

Use Rate:

Use 2-4 traps for a 10,000 square foot area or 8 to 16 traps per acre. For areas with heavy infestation, use a maximum of 48 traps per acre.

Liquid Level:

In hot and dry weather, liquid level in top chamber may evaporate below the Start Line before the attractant is due to be replaced. Do NOT add additional water to bring the liquid back up to the Start Line as it will reduce attractant effectiveness.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

Reusing the Trap:

The attractants in the AAA Trap are designed to last for 2 weeks. The AAA Attractant Kit contains a complete set of refill attractants to last an additional 2 weeks and should be available where you purchased the AAA Trap.

1. Check to make sure all trapped insects are dead.
2. Empty dead insects and clean any insect residue from trap. (Top chamber cannot be emptied of insects without replacing the attractant.)
3. Follow directions for baiting the bottom and top chambers in the initial set-up instructions.

Catching the Queens:

Queens emerge from hibernation during the first warm days of spring to look for new nest sites. When you place the AAA Trap outside at that time, you can capture the queens and reduce the likelihood that a nest will be established on or near your property.

CAUTION: Due to the extreme effectiveness of the attractant, use caution when placing and maintaining traps. Place and maintain traps in late evening or early morning when insects are less active. People allergic to stings should allow others to place and maintain traps for them. Wasp, hornet or yellowjacket stings can be fatal.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry, well-ventilated location out of reach of children and pets.

DISPOSAL: Deposit used attractant and attractant packaging in trash for collection. Wash hands with soap and water.

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the Bull Run AAA Trap.

www._____.com

Made in USA

Bull Run Scientific, VBT
740 Beaufont Springs Drive, Ste. 300
Richmond, VA 23225-5519
1-800-____-____

EPA Reg. No. 84565-___

EPA Est. No. _____

© _____, _____

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
 2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT
-

1.2. Trap Front Panel Label

AAA Trap for Wasps, Hornets & Yellowjackets

Reusable.

Attractant included.

Another environmentally responsible product from Bull Run.

1.3. Trap Back Panel Label

Model _____

AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS

Why guess which pest is bugging you? Now one trap does the trick. The Bull Run AAA Trap is the only trap proven to catch wasps, hornets and yellowjackets - 20 species in all!

The combination of three attractants and the distinctive design of the AAA Trap have been developed by the Bull Run team of scientists and extensively tested over numerous years.

Catches 20 species of stinging pest insects in one trap.

6 species of Paper Wasps.

Bald-faced Hornets and European Hornets.

12 species of Yellowjackets.

Non-toxic mode of action.

No killing agents — insects die naturally.

Will not trap beneficial honeybees.

Reusable.

Attractant included.

Another environmentally responsible product from Bull Run.

No killing agents — insects die naturally.

Two-week attractant kit included.

No extra food bait required.

Catches queens in spring before they build nests.

Catches workers from summer to fall.

Double-chambered design prevents insects from escaping.

Durable construction holds up for multiple seasons.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

CONTENTS	INGREDIENTS
1 TUBE	Active ingredient (naturally occurring)
NET WT:	Heptyl Butyrate 99.8%
0.05 oz	Other ingredients 0.2%
	Total 100.0%
1 VIAL	Active ingredient (naturally occurring)
NET WT:	2-Methyl-1-butanol 59.75%
0.05 oz	Other ingredients 40.25%
	Total 100.00%
1 BOTTLE	Active ingredient (naturally occurring)
NET WT:	Acetic Acid 8.0%
0.88 oz	Other ingredients 92.0%
	Total 100.0%

CAUTION. KEEP OUT OF REACH OF CHILDREN.

Attractant Bottle contents may cause eye and skin irritation.
Keep away from eyes and skin. Wash hands after handling product.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry, well-ventilated location out of reach of children and pets.

DISPOSAL: Deposit used attractant and attractant packaging in trash for collection. Wash hands with soap and water.

Visit www._____.com to learn more about our other insect traps and attractants.

Made in USA

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740 Beaufont Springs Drive, Ste. 300
Richmond, VA 23225-5519
1-800-____-____

EPA Reg. No. 84565-___

EPA Est. No. _____

© _____, _____

Patents pending

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

www._____.com

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the AAA Trap.

The Bull Run AAA Trap is proven to catch the following species, identified below by their coloration and markings:

6 species of Paper Wasps	[Illustrations]
Paper Wasp <i>Polistes fuscatus</i>	
European Paper Wasp <i>Polistes dominulus</i>	
Golden Paper Wasp <i>Polistes aurifer</i>	
Paper Wasp <i>Polistes metricus</i>	
Red Wasp <i>Polistes perplexus</i>	
Red Wasp <i>Polistes carolina</i>	
2 types of Hornets	
European Hornet <i>Vespa crabro</i>	
Bald-faced Hornet <i>Dolichovespula maculata</i>	
12 species of Yellowjackets	
Aerial Yellowjacket <i>Dolichovespula arenaria</i>	
Blackjacket <i>Vespula consobrina</i>	
California Yellowjacket <i>Vespula sulphurea</i>	
Common Yellowjacket <i>Vespula vulgaris</i>	
Eastern Yellowjacket <i>Vespula maculifrons</i>	
Forest Yellowjacket <i>Vespula acadica</i>	
German Yellowjacket <i>Vespula germanica</i>	
Northeastern Yellowjacket <i>Vespula vidua</i>	
Prairie Yellowjacket <i>Vespula atropilosa</i>	
Southern Yellowjacket <i>Vespula squamosa</i>	
Transition Yellowjacket <i>Vespula flavopilosa</i>	
Western Yellowjacket <i>Vespula pensylvanica</i>	

Wondering which of these insects are in your area? Find out at www._____.com

SEE INSTRUCTIONS INSIDE.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
 2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT
-

1.4. Attractant Tube Container Label

ATTRACTANT TUBE
CAUTION: KEEP OUT OF REACH OF CHILDREN

1.5. Attractant Vial Container Label

ATTRACTANT VIAL
CAUTION: KEEP OUT OF REACH OF CHILDREN

1.6. Attractant Bottle Container Label

ATTRACTANT BOTTLE
CAUTION: KEEP OUT OF REACH OF CHILDREN
May cause eye and skin irritation.
Keep away from eyes and skin. Wash hands after handling product.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

2.1 Product Insert

See Section 1.1.

2.2. Front Panel Label

Model _____

AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

2 week supply.

Works in the AAA Trap to capture 20 species of stinging pest insects!

6 species of Paper Wasps.

Bald-faced Hornets and European Hornets.

12 species of Yellowjackets.

Environmentally responsible.

No extra food bait required.

Non-toxic mode of action.

No killing agents — insects die naturally.

Lures queens & workers, spring to fall.

Will not lure beneficial honeybees.

CONTENTS	INGREDIENTS
1 TUBE	Active ingredient (naturally occurring)
NET WT:	Heptyl Butyrate 99.8%
0.05 oz	Other ingredients 0.2%
	Total 100.0%
1 VIAL	Active ingredient (naturally occurring)
NET WT:	2-Methyl-1-butanol 59.75%
0.05 oz	Other ingredients 40.25%
	Total 100.00%
1 BOTTLE	Active ingredient (naturally occurring)
NET WT:	Acetic Acid 8.0%
0.88 oz	Other ingredients 92.0%
	Total 100.0%

CAUTION. KEEP OUT OF REACH OF CHILDREN.
See back panel for additional precautionary statements.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

2.3. Back Panel Label

**AAA
WASP HORNET YELLOWJACKET
ATTRACTANT KIT**

For use in the AAA Trap for Wasps, Hornets & Yellowjackets

The AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT is proven to lure the following species: Paper Wasp (*Polistes fuscatus*), European Paper Wasp (*P. dominulus*), Golden Paper Wasp (*P. aurifer*), Red Wasp (*P. perplexus*), Paper Wasp (*P. metricus*), Red Wasp (*P. carolino*), European Hornet (*Vespa crabro*), Bald-faced Hornet (*Dolichovespula maculata*), Aerial Yellowjacket (*D. orenoria*), Blackjacket (*Vespula consobrina*), California Yellowjacket (*V. sulphurea*), Common Yellowjacket (*V. vulgaris*), Eastern Yellowjacket (*V. maculifrons*), Forest Yellowjacket (*V. ocodica*), German Yellowjacket (*V. germanica*), Northeastern Yellowjacket (*V. vidua*), Prairie Yellowjacket (*V. atropilosa*), Southern Yellowjacket (*V. squamosa*), Transition Yellowjacket (*V. flavopilosa*), Western Yellowjacket (*V. pensylvanica*).

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the Bull Run AAA Trap. www._____.com

PRECAUTIONARY STATEMENTS

CAUTION. Attractant Bottle contents may cause eye and skin irritation.
Keep away from eyes and skin. Wash hands after handling product.

CAUTION: Due to the extreme effectiveness of the attractant, use caution when placing and maintaining traps. Place and maintain traps in late evening or early morning when insects are less active. People allergic to stings should allow others to place and maintain traps for them. Wasp, hornet or yellowjacket stings can be fatal.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry, well-ventilated location out of reach of children and pets.

DISPOSAL: Deposit used attractant and used attractant packaging in trash for collection. Wash hands with soap and water.

Made in USA

Bull Run Scientific, VBT
740 Beaufont Springs Drive, Ste. 300
Richmond, VA 23225-5519
1-800-____-____

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1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
 2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT
-

EPA Reg. No. 84565-___

EPA Est. No. _____

Patents Pending

2.4. Attractant Vial Container Label

See Section 1.4.

2.5. Attractant Bottle Container Label

See Section 1.5.

2.6. Attractant Tube Container Label

See Section 1.6.

**JUNE 16, 2001 PROPOSED MASTER LABEL (excluding graphics)
for the WASP HORNET YELLOWJACKET TRAP SYSTEM (EPA File Symbol 84565-___)
and Alternate Brand Names:**

- 1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and**
- 2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT**

Page 1 of 11

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Notes:

- The **WASP HORNET YELLOWJACKET TRAP SYSTEM** contains three attractants, each with one active ingredient:
 - Heptyl butyrate (99.8%);
 - 2-Methyl-1-butanol (59.75%); and
 - Acetic acid (8.0%).
- The **AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS** includes the trap and the three attractants.
- The **AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT** is the attractant refill for the **AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS** and contains the three attractants without the trap.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS

1.1. Product Insert

**AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS
and
AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT**

PRODUCT INSERT (INSTRUCTIONS)

The attractants in the AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS and the AAA ATTRACTANT KIT are proven to trap the following species: Paper Wasp (*Polistes fuscatus*), European Paper Wasp (*P. dominulus*), Golden Paper Wasp (*P. aurifer*), Red Wasp (*P. perplexus*), Paper Wasp (*P. metricus*), Red Wasp (*P. carolina*), European Hornet (*Vespa crabro*), Bald-faced Hornet (*Dolichovespula maculata*), Aerial Yellowjacket (*D. arenaria*), Blackjacket (*Vespula consobrina*), California Yellowjacket (*V. sulphurea*), Common Yellowjacket (*V. vulgaris*), Eastern Yellowjacket (*V. maculifrons*), Forest Yellowjacket (*V. acadica*), German Yellowjacket (*V. germanica*), Northeastern Yellowjacket (*V. vidua*), Prairie Yellowjacket (*V. atripilis*), Southern Yellowjacket (*V. squamosa*), Transition Yellowjacket (*V. flavopilosa*), Western Yellowjacket (*V. pensylvanica*).

CONTENTS	INGREDIENTS
1 TUBE NET WT: 0.05 oz	Active ingredient (naturally occurring) Heptyl Butyrate 99.8% Other ingredients 0.2% Total 100.0%
1 VIAL NET WT: 0.05 oz	Active ingredient (naturally occurring) 2-Methyl-1-butanol 59.75% Other ingredients 40.25% Total 100.00%
1 BOTTLE NET WT: 0.88 oz	Active ingredient (naturally occurring) Acetic Acid 8.0% Other ingredients 92.0% Total 100.0%

CAUTION

KEEP OUT OF REACH OF CHILDREN

Contents of enclosed bottle may cause eye and skin irritation.
Keep away from eyes and skin. Wash hands after handling product.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
 2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT
-

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[Illustration of trap components]

INITIAL SETUP

1. Unscrew trap top cap; remove twist-tie and enclosed Attractant Vial and Attractant Bottle.
2. Unscrew trap bottom cap; remove Attractant Tube and felt pad. (Leave cone in place.)
3. Bait the bottom chamber first:
 - a. Place felt pad into attractant cup in trap bottom cap.
 - b. Cut tip of Attractant Tube.
 - c. Carefully empty attractant liquid onto felt pad.
 - d. Screw bottom cap back in place.
 - e. Set trap on flat surface.
4. Next, bait the top chamber:
 - a. Remove Attractant Vial from its plastic pouch.
 - b. Pop open lid to Attractant Vial and snap into one of three notches next to the cone in the trap top cap. (Figure 1)
 - c. Unscrew lid to Attractant Bottle and pour liquid into trap top chamber.
 - d. Add water to trap top chamber so solution reaches the Start Line.
 - e. Thread twist-tie through hole on trap top cap.
 - f. Screw top cap back on and hang outdoors. (Figure 2)

Figure 1	Figure 2
----------	----------

Trap Placement:

1. Hang trap away from human activity.
2. Hang at least 20 feet away from a known wasp, hornet or yellowjacket nest.
3. In extreme hot and dry weather, hang trap in the shade.

Use Rate:

Use 2-4 traps for a 10,000 square foot area or 8 to 16 traps per acre. For areas with heavy infestation, use a maximum of 48 traps per acre.

Liquid Level:

In hot and dry weather, liquid level in top chamber may evaporate below the Start Line before the attractant is due to be replaced. Do NOT add additional water to bring the liquid back up to the Start Line as it will reduce attractant effectiveness.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

Reusing the Trap:

The attractants in the AAA Trap are designed to last for 2 weeks. The AAA Attractant Kit contains a complete set of refill attractants to last an additional 2 weeks and should be available where you purchased the AAA Trap.

1. Check to make sure all trapped insects are dead.
2. Empty dead insects and clean any insect residue from trap. (Top chamber cannot be emptied of insects without replacing the attractant.)
3. Follow directions for baiting the bottom and top chambers in the initial set-up instructions.

Catching the Queens:

Queens emerge from hibernation during the first warm days of spring to look for new nest sites. When you place the AAA Trap outside at that time, you can capture the queens and reduce the likelihood that a nest will be established on or near your property.

CAUTION: Due to the extreme effectiveness of the attractant, use caution when placing and maintaining traps. Place and maintain traps in late evening or early morning when insects are less active. People allergic to stings should allow others to place and maintain traps for them. Wasp, hornet or yellowjacket stings can be fatal.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry, well-ventilated location out of reach of children and pets.

DISPOSAL: Deposit used attractant and attractant packaging in trash for collection. Wash hands with soap and water.

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the Bull Run AAA Trap.

www._____.com

Made in USA

Bull Run Scientific, VBT
740 Beaufont Springs Drive, Ste. 300
Richmond, VA 23225-5519
1-800-____-____

EPA Reg. No. 84565-____
EPA Est. No. _____

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1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
 2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT
-

1.2. Trap Front Panel Label

AAA Trap for Wasps, Hornets & Yellowjackets

Reusable.

Attractant included.

Another environmentally responsible product from Bull Run.

1.3. Trap Back Panel Label

Model _____

AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS

Why guess which pest is bugging you? Now one trap does the trick. The Bull Run AAA Trap is the only trap proven to catch wasps, hornets and yellowjackets - 20 species in all!

The combination of three attractants and the distinctive design of the AAA Trap have been developed by the Bull Run team of scientists and extensively tested over numerous years.

Catches 20 species of stinging pest insects in one trap.

6 species of Paper Wasps.

Bald-faced Hornets and European Hornets.

12 species of Yellowjackets.

Non-toxic mode of action.

No killing agents — insects die naturally.

Will not trap beneficial honeybees.

Reusable.

Attractant included.

Another environmentally responsible product from Bull Run.

No killing agents — insects die naturally.

Two-week attractant kit included.

No extra food bait required.

Catches queens in spring before they build nests.

Catches workers from summer to fall.

Double-chambered design prevents insects from escaping.

Durable construction holds up for multiple seasons.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

CONTENTS	INGREDIENTS
1 TUBE NET WT: 0.05 oz	Active ingredient (naturally occurring) Heptyl Butyrate 99.8% Other ingredients 0.2% Total 100.0%
1 VIAL NET WT: 0.05 oz	Active ingredient (naturally occurring) 2-Methyl-1-butanol 59.75% Other ingredients 40.25% Total 100.00%
1 BOTTLE NET WT: 0.88 oz	Active ingredient (naturally occurring) Acetic Acid 8.0% Other ingredients 92.0% Total 100.0%

CAUTION. KEEP OUT OF REACH OF CHILDREN.

Attractant Bottle contents may cause eye and skin irritation.
Keep away from eyes and skin. Wash hands after handling product.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry, well-ventilated location out of reach of children and pets.

DISPOSAL: Deposit used attractant and attractant packaging in trash for collection. Wash hands with soap and water.

Visit www._____.com to learn more about our other insect traps and attractants.

Made in USA

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1-800-____-____

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Patents pending

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

www._____.com

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the AAA Trap.

The Bull Run AAA Trap is proven to catch the following species, identified below by their coloration and markings:

6 species of Paper Wasps	[Illustrations]
Paper Wasp <i>Polistes fuscatus</i>	
European Paper Wasp <i>Polistes dominulus</i>	
Golden Paper Wasp <i>Polistes aurifer</i>	
Paper Wasp <i>Polistes metricus</i>	
Red Wasp <i>Polistes perplexus</i>	
Red Wasp <i>Polistes carolina</i>	
2 types of Hornets	
European Hornet <i>Vespa crabro</i>	
Bald-faced Hornet <i>Dolichovespula maculata</i>	
12 species of Yellowjackets	
Aerial Yellowjacket <i>Dolichovespula arenaria</i>	
Blackjacket <i>Vespula consobrina</i>	
California Yellowjacket <i>Vespula sulphurea</i>	
Common Yellowjacket <i>Vespula vulgaris</i>	
Eastern Yellowjacket <i>Vespula maculifrons</i>	
Forest Yellowjacket <i>Vespula acadica</i>	
German Yellowjacket <i>Vespula germanica</i>	
Northeastern Yellowjacket <i>Vespula vidua</i>	
Prairie Yellowjacket <i>Vespula atropilosa</i>	
Southern Yellowjacket <i>Vespula squamosa</i>	
Transition Yellowjacket <i>Vespula flavopilosa</i>	
Western Yellowjacket <i>Vespula pensylvanica</i>	

Wondering which of these insects are in your area? Find out at www._____.com

SEE INSTRUCTIONS INSIDE.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
 2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT
-

1.4. Attractant Tube Container Label

ATTRACTANT TUBE
CAUTION: KEEP OUT OF REACH OF CHILDREN

1.5. Attractant Vial Container Label

ATTRACTANT VIAL
CAUTION: KEEP OUT OF REACH OF CHILDREN

1.6. Attractant Bottle Container Label

ATTRACTANT BOTTLE
CAUTION: KEEP OUT OF REACH OF CHILDREN
May cause eye and skin irritation.
Keep away from eyes and skin. Wash hands after handling product.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

2.1 Product Insert

See Section 1.1.

2.2. Front Panel Label

Model _____

**AAA
WASP HORNET YELLOWJACKET
ATTRACTANT KIT**

2 week supply.

Works in the AAA Trap to capture 20 species of stinging pest insects!

6 species of Paper Wasps.

Bald-faced Hornets and European Hornets.

12 species of Yellowjackets.

Environmentally responsible.

No extra food bait required.

Non-toxic mode of action.

No killing agents — insects die naturally.

Lures queens & workers, spring to fall.

Will not lure beneficial honeybees.

CONTENTS	INGREDIENTS
1 TUBE NET WT: 0.05 oz	Active ingredient (naturally occurring) Heptyl Butyrate 99.8% Other ingredients 0.2% Total 100.0%
1 VIAL NET WT: 0.05 oz	Active ingredient (naturally occurring) 2-Methyl-1-butanol 59.75% Other ingredients 40.25% Total 100.00%
1 BOTTLE NET WT: 0.88 oz	Active ingredient (naturally occurring) Acetic Acid 8.0% Other ingredients 92.0% Total 100.0%

CAUTION. KEEP OUT OF REACH OF CHILDREN.
See back panel for additional precautionary statements.

1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT

2.3. Back Panel Label

**AAA
WASP HORNET YELLOWJACKET
ATTRACTANT KIT**

For use in the AAA Trap for Wasps, Hornets & Yellowjackets

The AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT is proven to lure the following species: Paper Wasp (*Polistes fuscatus*), European Paper Wasp (*P. dominulus*), Golden Paper Wasp (*P. aurifer*), Red Wasp (*P. perplexus*), Paper Wasp (*P. metricus*), Red Wasp (*P. carolina*), European Hornet (*Vespa crabro*), Bald-faced Hornet (*Dolichovespula maculata*), Aerial Yellowjacket (*D. arenaria*), Blackjacket (*Vespula consobrina*), California Yellowjacket (*V. sulphurea*), Common Yellowjacket (*V. vulgaris*), Eastern Yellowjacket (*V. maculifrons*), Forest Yellowjacket (*V. acadica*), German Yellowjacket (*V. germanica*), Northeastern Yellowjacket (*V. vidua*), Prairie Yellowjacket (*V. atropilosa*), Southern Yellowjacket (*V. squamosa*), Transition Yellowjacket (*V. flavopilosa*), Western Yellowjacket (*V. pensylvanica*).

Visit our web site for more information on the different species of wasps, hornets and yellowjackets caught in the Bull Run AAA Trap. www._____.com

PRECAUTIONARY STATEMENTS

CAUTION. Attractant Bottle contents may cause eye and skin irritation.
Keep away from eyes and skin. Wash hands after handling product.

CAUTION: Due to the extreme effectiveness of the attractant, use caution when placing and maintaining traps. Place and maintain traps in late evening or early morning when insects are less active. People allergic to stings should allow others to place and maintain traps for them. Wasp, hornet or yellowjacket stings can be fatal.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry, well-ventilated location out of reach of children and pets.

DISPOSAL: Deposit used attractant and used attractant packaging in trash for collection. Wash hands with soap and water.

Made in USA

Bull Run Scientific, VBT
740 Beaufont Springs Drive, Ste. 300
Richmond, VA 23225-5519
1-800-____-____

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1. AAA TRAP FOR WASPS, HORNETS & YELLOWJACKETS, and
 2. AAA WASP HORNET YELLOWJACKET ATTRACTANT KIT
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EPA Est. No. _____

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2.4. Attractant Vial Container Label

See Section 1.4.

2.5. Attractant Bottle Container Label

See Section 1.5.

2.6. Attractant Tube Container Label

See Section 1.6.

I hereby certify for Bull Run Scientific, VBT that, for the purposes of FIFRA section 12(a)(1)(C), the description of the composition of Wasp Hornet Yellowjacket Attractant System Attractant Vial, File Symbol 84565-G, refers to the composition set forth on the Confidential Statement of Formula and supporting materials. This description includes the representation that:

1. No ingredient will be present in the product in an amount greater than the upper certified limit or in an amount less than the lower certified limit (if required) specified for that ingredient in a currently approved Statement of Formula (or as calculated by the Agency); and
2. If the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.

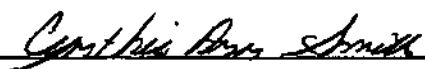


May 22, 2009

Cynthia Ann Smith
Vice President, Conn & Smith, Inc.
Agent for Bull Run Scientific, VBT

I hereby certify for Bull Run Scientific, VBT that, for the purposes of FIFRA section 12(a)(1)(C), the description of the composition of Wasp Hornet Yellowjacket Attractant System Attractant Bottle, File Symbol 84565-G, refers to the composition set forth on the Confidential Statement of Formula and supporting materials. This description includes the representation that:

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2. If the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.

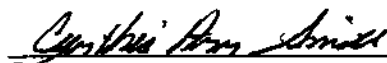


May 22, 2009

Cynthia Ann Smith
Vice President, Conn & Smith, Inc.
Agent for Bull Run Scientific, VBT

I hereby certify for Bull Run Scientific, VBT that, for the purposes of FIFRA section 12(a)(1)(C), the description of the composition of Yellowjacket Attractant, File Symbols 84565-G and 84565-U, refers to the composition set forth on the Confidential Statement of Formula and supporting materials. This description includes the representation that:

1. No ingredient will be present in the product in an amount greater than the upper certified limit or in an amount less than the lower certified limit (if required) specified for that ingredient in a currently approved Statement of Formula (or as calculated by the Agency); and
2. If the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.


_____

May 22, 2009

Cynthia Ann Smith
Vice President, Conn & Smith, Inc.
Agent for Bull Run Scientific, VBT

I hereby certify for Bull Run Scientific, VBT that, for the purposes of FIFRA section 12(a)(1)(C), the description of the composition of Wasp Hornet Yellowjacket Attractant System Attractant Vial, File Symbol 84565-G, refers to the composition set forth on the Confidential Statement of Formula and supporting materials. This description includes the representation that:

1. No ingredient will be present in the product in an amount greater than the upper certified limit or in an amount less than the lower certified limit (if required) specified for that ingredient in a currently approved Statement of Formula (or as calculated by the Agency); and
2. If the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.



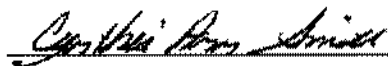
May 22, 2009

Cynthia Ann Smith
Vice President, Conn & Smith, Inc.
Agent for Bull Run Scientific, VBT

Yellowjacket Attractant
EPA File Symbols 84565-G and 84565-U
Confidential Statement of Formula
May 22, 2009 - Page 2 of 2

I hereby certify for Bull Run Scientific, VBT that, for the purposes of FIFRA section 12(a)(1)(C), the description of the composition of Yellowjacket Attractant, File Symbols 84565-G and 84565-U, refers to the composition set forth on the Confidential Statement of Formula and supporting materials. This description includes the representation that:

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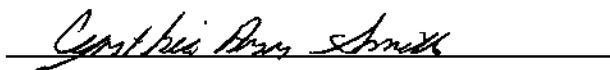
May 22, 2009

Cynthia Ann Smith
Vice President, Conn & Smith, Inc.
Agent for Bull Run Scientific, VBT

Wasp Hornet Yellowjacket Attractant System Attractant Bottle
EPA File Symbol 84565-G
Confidential Statement of Formula
May 22, 2009 - Page 2 of 2

I hereby certify for Bull Run Scientific, VBT that, for the purposes of FIFRA section 12(a)(1)(C), the description of the composition of Wasp Hornet Yellowjacket Attractant System Attractant Bottle, File Symbol 84565-G, refers to the composition set forth on the Confidential Statement of Formula and supporting materials. This description includes the representation that:

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2. If the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.



May 22, 2009

Cynthia Ann Smith
Vice President, Conn & Smith, Inc.
Agent for Bull Run Scientific, VBT

Wasp Hornet Yellowjacket Attractant System Attractant Bottle
Confidential Statement of Formula
June 14, 2008 - Page 2 of 2

I hereby certify for Bull Run Scientific, VBT that, for the purposes of FIFRA section 12(a)(1)(C), the description of the composition of Wasp Hornet Yellowjacket Attractant System Attractant Bottle, File Symbol 84565-___, refers to the composition set forth on the Confidential Statement of Formula and supporting materials. This description includes the representation that:

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2. If the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.



June 14, 2008

Cynthia Ann Smith
Vice President, Conn & Smith, Inc.
Agent for Bull Run Scientific, VBT

I hereby certify for Bull Run Scientific, VBT that, for the purposes of FIFRA section 12(a)(1)(C), the description of the composition of Yellowjacket Attractant, File Symbol 84565-____, refers to the composition set forth on the Confidential Statement of Formula and supporting materials. This description includes the representation that:

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2. If the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.



June 14, 2008

(
Cynthia Ann Smith
Vice President, Conn & Smith, Inc.
Agent for Bull Run Scientific, VBT



Certification with Respect to Citation of Data

Applicants Name and Address

Bull Run Scientific, VBT
7400 Beaufont Springs Drive, Suite 300
Richmond, VA 23225-5519

EPA File Symbol/Registration Number
84565-

Product Name Disposable Bull Run Yellowjacket Trap E

Date of Application June 16, 2008

NOTE: If your product is a 100% repackaging of another EPA-registered product that you purchase, and is labeled for the same uses, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

1. This application is supported by all data submitted or cited in the application. In addition, if cite-all options are indicated, this application is supported by all data in the Agency's files that concern the properties or effects of this product that is identical or substantially similar and that is one of the types of data that would be required to be submitted if this application sought the initial registration of a product of identical or similar composition and intended uses under the data requirements in effect on the date of approval of this application. (Check the appropriate boxes, in items 2 and 3, or 4 below that pertain to your application.)

2. I certify that, for each study cited in support of this application for registration that is an exclusive use study.

☒ I am the original submitter*; or

☐ I have obtained the written permission of the original submitter for _____, which is
(insert name of chemical)
_____ (for multiple chemicals link the companies who are original data submitters
(insert names of companies)
with the appropriate chemical name) to cite that study*

3. I certify that, for each study cited in support of this application for registration that is not an exclusive use study;

a. ☐ I am the original data submitter*; or

☐ I have obtained the written permission of the original data submitter for _____, which is
(insert name of chemical)
_____ (for multiple chemicals link the companies who are original data submitters
(insert names of companies)
with the appropriate chemical name) to cite that study*; or

b. I have notified in writing the companies _____ for _____ that
(insert names of companies) (insert name of chemical)
have submitted data I have cited to support this application and have offered to: (a) Pay compensation for those data in accordance with section 3(c)(1)(F) and 3(c)(2)(D) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA); and (b) Commence negotiations to determine which data are subject to the compensation requirement of FIFRA and the amount and terms of compensation due, if any. The companies I have notified are:

Companies _____ for _____ (for multiple
(insert names of companies) (insert name of chemical)
chemicals link the companies who are original data submitters with the appropriate chemical name)
listed on the Pesticide Data Submitters List for all active ingredients contained in my product (cite-all
method or cite-all option under Selective Method*). (Also, sign the General Offer Statement below.)

Companies _____ for _____ (for multiple
(insert names of companies) (insert name of chemical)
chemicals link the companies who are original data submitters with the appropriate chemical name)
that have submitted the studies which I have cited (Selective method*).

4. I certify that for each study cited in support of this application I am not required to offer data compensation or obtain written permission because all time periods for exclusive use and data compensation have expired.

* A Data Matrix identifying these studies is attached. (Note: a Data Matrix is not required under the cite-all method)

Signature Cynthia Ann Smith Name and Title Cynthia Ann Smith, Agent for Bull Run Scientific, VBT Date 6/16/2008

General Offer to Pay: I hereby offer and agree to pay compensation to other persons, with regard to
the approval of this application, to the extent required.

Signature

Name and Title

Date